

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CHANCERY DIVISION**

THE PEOPLE OF THE STATE OF  
ILLINOIS, *ex rel.* KWAME RAOUL,  
Attorney General of Illinois,

Plaintiff,

vs.

LOCKOR, LLC, an Illinois limited  
liability company, and  
NICHOLAS J. KORY, an individual,

Defendants.

Case No.

**COMPLAINT**

The People of the State of Illinois, by Kwame Raoul, Attorney General of Illinois, bring this Complaint against Lockor, LLC (“Lockor”), an Illinois limited liability company, and Nicholas J. Kory (“Kory”), an individual acting as president and manager of Lockor (collectively “Defendants”), for violations of the Child Labor Law, 820 ILCS 205/0.5 *et seq.* (the “Child Labor Law” or the “Act”).

**NATURE OF THE CASE**

1. This is a workplace rights enforcement action by the State of Illinois against Nicholas J. Kory and his business, Lockor, LLC, arising out of findings that Defendants engaged in systemic violations of Illinois child labor laws. Nicholas J. Kory is the owner, president, and manager of Lockor. Defendants own and operate a McDonald’s franchise restaurant located in Lockport, Illinois.
2. Beginning in July 2023, the Illinois Department of Labor (“IDOL”) investigated Defendants regarding their employment of dozens of 14- and 15- year-

old children in a McDonald's restaurant. A copy of the Notice to Employer is attached hereto as Exhibit A. As a result of the investigation, IDOL found that Defendants had violated the Child Labor Law hundreds of times over a seven-month period. These violations included failing to obtain documentation that children had authorization to work, permitting children to work without rest and meal breaks, permitting children to work excessive hours during the school year, having children work late at night, including as late as one o'clock in the morning, and—most egregiously—allowing children to work over eight hours each day, including shifts as long as seventeen hours straight.

3. Over the entire audit period, Lockor and Kory had at least 26 minors working in violation of the Child Labor Law nearly every day their restaurant was open. In total, IDOL uncovered at least 568 instances where Defendants violated State law during the investigation period of January 1, 2023 to July 8, 2023.

4. On November 2, 2023, IDOL issued a Notice of Violation against Lockor, assessing civil penalties against the company in the amount of \$2,179,000. A copy of the Notice of Violation is attached hereto as Exhibit B. To date, the company has paid nothing.

5. Now, the Illinois Attorney General files this action to hold Lockor and Kory accountable for their egregious, unlawful employment of children in violation of State law. The Attorney General seeks civil monetary penalties and equitable relief, including a permanent injunction against Defendants to prohibit them from further violations of the Child Labor Law.

## **JURISDICTION AND VENUE**

6. This action is brought pursuant to section 6.3(b) of the Attorney General Act, 15 ILCS 205/6.3(b). It seeks equitable relief and penalties for violations of Sections 3–4, 6, and 9 of the Child Labor Law, 820 ILCS 205/3, 5–9. Plaintiff seeks civil penalties for these violations under Section 75 of the Child Labor Law of 2024. *See* 820 ILCS 206/75, 115.

7. This Court has personal jurisdiction over Defendants. Lockor is a domestic company incorporated under the laws of Illinois and has its principal place of business within Illinois. 735 ILCS 5/2-209(a)(1), (b)(3). Kory is a natural person domiciled in Illinois, and this dispute arises out of his actions as manager and officer of a company organized in Illinois. *Id.* § 2-209(a)(12), (b)(1).

8. Venue is proper in Cook County because Lockor is a resident of Cook County. *Id.* § 5/2-102. Specifically, Lockor is a limited liability company organized under the laws of Illinois and has its registered office in Cook County. *Id.* § 5/2-102(a).

## **RELEVANT STATUTORY AND REGULATORY PROVISIONS**

9. The Child Labor Law prohibits employment of minors under the age of 16 in most occupations unless the employer first obtains an employment certificate issued by a local school authority. 820 ILCS 205/6, 8, 9.

10. The Act allows children 14 and 15 years of age to be employed, but only outside school hours and only in specified non-manufacturing and non-hazardous jobs, under specified conditions. *Id.* § 205/1, 3; *see also* 56 Ill. Admin. Code

§ 250.805. The Child Labor Law also limits when minors can work and the total amount of hours they are allowed to work each day and each week. 820 ILCS 205/3.

11. Specifically, Section 3 of the Child Labor Law prohibits employers from permitting children 14 and 15 years of age to work:

- a) for more than six consecutive days in any one week;
- b) over 48 hours in any calendar week when school is not in session;
- c) over eight hours per day;
- d) between 7 p.m. and 7 a.m. from Labor Day until June 1 or between 9 p.m. and 7 a.m. from June 1 until Labor Day;
- e) over three hours on a day that school is in session;
- f) over eight hours per day combining school and work hours; or
- g) over twenty-four hours in any calendar week when school is in session.

820 ILCS 205/3; *see also* 56 Ill. Admin. Code § 250.805.

12. Anyone who employs minor children must also follow additional requirements related to recordkeeping, including maintaining a register of employed minors between the ages of 14 and 16 and keeping on file employment certificates from any of the minors under 16 that they employed. 820 ILCS 205/6.

13. Section 17 of the Act provides that IDOL has the power to conduct investigations and inspections to enforce the Child Labor Law. *Id.* § 205/17.

14. In 2024, the General Assembly replaced the Child Labor Law with a revised version of the Act. *See* Pub. Act 103-721. The new statute—titled the Child Labor Law of 2024—generally establishes the same limitations on child labor as the prior Act, including restrictions on when children 14 and 15 years of age can work.

See 820 ILCS 206/15, /25, /30, and /35. The Child Labor Law of 2024, however, increased the available civil penalties for anyone who permits a minor to work in violation of the law, from a maximum of \$5,000 per violation to up to \$10,000 per day during which any violation continues and for each minor unlawfully employed. See 820 ILCS 206/75.

15. The General Assembly intended for these amended civil penalties under the Child Labor Law of 2024 to be retroactively applied to violations of the pre-2024 Child Labor Law. See 820 ILCS 206/115.

## **FACTUAL ALLEGATIONS**

### **Parties**

16. The People, by Kwame Raoul, Attorney General of Illinois, bring this action as authorized by the Attorney General Act. 15 ILCS 205/4; *id.* § 205/6.3(b).

17. In 2019, the General Assembly found that the welfare and prosperity of all Illinois citizens and businesses required the establishment of a unit within the Attorney General's Office dedicated to, *inter alia*, pursuing businesses that underpay their employees and gain an unfair economic advantage by avoiding their labor responsibilities. 15 ILCS 205/6.3(a). The Attorney General's Workplace Rights Bureau exercises this statutory authority.

18. Defendant Lockor, LLC is a limited liability company organized under Illinois law. Lockor's registered office is located at 1 N. LaSalle St., Ste 1350, Chicago, Illinois 60602-4551. Lockor operates a McDonald's fast-food franchise located at 1039 E. 9<sup>th</sup> Street, Lockport, Illinois 60441.

19. Defendant Nicholas J. Kory is the owner, principal officer, president, and manager of Lockor. At all relevant times, Kory was an agent of Lockor.

### **Defendants' Child Labor Violations**

20. On July 3, 2023, IDOL received a complaint from a constituent alleging that Lockor and Kory were in violation of the Child Labor Law by permitting or requiring employees under the age of 16 to work late at night at the McDonald's restaurant in Lockport, Illinois.

21. Pursuant to Section 17 of the Child Labor Law, IDOL initiated an investigation of Defendants' employment of minors at the McDonald's fast-food restaurant located at 1039 E. 9<sup>th</sup> Street, Lockport, Illinois 60441.

22. IDOL sent a "Notice to Employer" to Lockor and requested records related to its employment of minors, including employees' employment certificates and time records, for the period from January 1, 2023 to July 8, 2023 (the "Investigation Period"). *See* Exhibit A. Unless stated otherwise, all allegations and conditions described here pertain to the Investigation Period.<sup>1</sup>

23. IDOL's investigation revealed that Defendants employed twenty-six minors under age 16 at their McDonald's location in Lockport, Illinois during the Investigation Period.

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<sup>1</sup> If Defendants continued to violate the Child Labor Law after the Investigation Period, then the allegations and conditions of employment disclosed are incorporated herein by reference and Defendants may be liable for additional violations of the Child Labor Law, including additional civil monetary penalties.

24. On average, Defendants employ thirty-six employees at its McDonald's restaurant. During the Investigation Period, over two-thirds of Defendants' employees at its business were children aged 14 or 15.

25. Out of twenty-six minors under age 16 who were employed by Defendants at their McDonald's restaurant during the Investigation Period, Defendants procured employment certificates for only six.

26. Defendants did not obtain, keep, or procure valid employment certificates for the remaining twenty minors in order to permit them to be employed by Defendants during the Investigation Period.

27. IDOL's investigation also found that Defendants had employed minors under the age of 16 to work over eight hours per day at their McDonald's restaurant at least 48 times during the Investigation Period.

28. For at least one minor who worked during the Investigation Period, Defendants allowed the minor to work multiple shifts exceeding twelve hours, including some shifts that lasted up to seventeen hours.

29. IDOL's investigation also found that, approximately 270 times during the Investigation Period, Defendants permitted minors under the age of 16 to work after 7pm when school was in session and after 9pm when school was out of session.

30. On many occasions, Defendants permitted minors under the age of 16 to work very late at night, including numerous instances where minors as young as 14 years old worked past 11pm on school nights. Another minor frequently worked past midnight and even as late as 1:30am.

31. IDOL's investigation also found that, approximately 155 times during the Investigation Period, Defendants permitted minors under the age of 16 to work more than three hours in a day while school was in session.

32. IDOL's investigation also found that Defendants had permitted minors under the age of 16 to work more than five hours without a required 30-minute meal or rest break—approximately 55 times during the Investigation Period.

33. IDOL's investigation also found that Defendants had failed to keep on file employment certificates at the place of employment for at least seventeen of the minors under the age of 16 during the time period when they were employed by Defendants.

34. On November 2, 2023, IDOL sent to Lockor a formal Notice of Violation, in which IDOL identified 568 distinct violations of the Child Labor Law and assessed a total of \$2,179,000 in civil monetary penalties, pursuant to its then-existing authority under Section 17.3 of the Child Labor Law. *See Exhibit B.*

35. To date, Defendants have not paid any civil monetary penalties related to IDOL's investigation in this matter.

36. In addition to the Child Labor Law violations identified by IDOL in its Notice of Violation, Defendants also permitted at least one minor to work for ten days straight during the Investigation Period, including working a 12-hour shift and another 17-hour shift in that span. Permitting a minor to work more than six consecutive days in a week is an additional violation of 820 ILCS 205/3.

37. Each day during which any violation of the Child Labor Law continues is a separate and distinct violation of the Act. 820 ILCS 206/75(a).

38. The employment of each minor in violation of the Child Labor Law is also a separate and distinct violation of the Act. *Id.*

39. The total number of days during which Defendants caused a violation of the Child Labor Law to continue at their McDonald's restaurant for each minor employed in violation of the Child Labor Law is at least 495 days. Thus, Defendants are liable for civil monetary penalties related to at least 495 separate and distinct violations of the Act.

40. On information and belief, Defendants have continued to permit minor children under age 16 to work in violation of the Child Labor Law or the Child Labor Law of 2024 after the conclusion of the Investigation Period.

**COUNT I**  
**Violations of Illinois Child Labor Law**  
**Against All Defendants**

41. Paragraphs 1 through 40 are incorporated herein by reference.

42. Defendant Lockor employed minors under the age of 16 to work at its McDonald's restaurant in Lockport, Illinois.

43. Defendant Kory was a principal officer or agent of Lockor.

44. Defendant Kory permitted minor children under the age of 16 to work for Lockor.

45. Defendant Kory acted directly and indirectly in the interest of Lockor in relation to minor employees under the age of 16 performing services for Lockor.

46. Defendants violated Section 3 of the Child Labor Law, 820 ILCS 205/3, by permitting minors under the age of 16 to work over eight hours per day.

47. Defendants violated Section 3 of the Child Labor Law, 820 ILCS 205/3, by permitting minors under the age of 16 to work after 7pm when school was in session and after 9pm when school was out of session.

48. Defendants violated Section 3 of the Child Labor Law, 820 ILCS 205/3, by permitting minors under the age of 16 to work more than three hours in a day while school was in session.

49. Defendants violated Section 3 of the Child Labor Law, 820 ILCS 205/3, by permitting minors under the age of 16 to work more than six consecutive days in any one week.

50. Defendants violated Section 4 of the Child Labor Law, 820 ILCS 205/4, by permitting minors under the age of 16 to work more than five hours without receiving a meal or rest break.

51. Defendants violated Section 9 of the Child Labor Law, 820 ILCS 205/9, by employing minors under the age of 16 without procuring and keeping on file an employment certificate authorizing said minor to work.

52. Defendants violated Section 13 of the Child Labor Law, 820 ILCS 205/13, by failing to keep on file at the place of employment an employment certificate for each of the minors under the age of 16 that Defendants employed.

53. The Child Labor Law of 2024 provides for civil penalties of \$10,000 per violation. 820 ILCS 206/75(a)(5). Each day during which any violation continued

constitutes a separate and distinct offense, and the employment of any minor in violation of the Act, with respect to each minor unlawfully employed, constitutes a separate and distinct offense.

54. The Child Labor Law of 2024 also provides for additional penalties of up to an amount equal to the penalties assessed by IDOL to be distributed to impacted minors. 820 ILCS 206/75(c).

55. In an action brought under section 6.3 of the Attorney General Act, the Attorney General may obtain, as remedies, monetary damages to the State, civil penalties in the maximum amount prescribed by law, and equitable relief as may be appropriate. 15 ILCS 205/6.3(d).

WHEREFORE, Plaintiff prays that this Honorable Court:

- a. Award judgment in Plaintiff's favor;
- b. Award the appropriate amount of civil penalties, as provided by the Child Labor Law of 2024, to be deposited into the Child Labor and Day and Temporary Labor Services Enforcement Fund in the Illinois State treasury;
- c. Award the equal amount of civil penalties, as provided by the Child Labor Law of 2024, to be distributed equally among minors impacted by Defendants' unlawful conduct;
- d. Enjoin Defendants from engaging in employment practices that violate the Child Labor Law of 2024; and
- e. Grant such other relief that the Court deems appropriate.

THE PEOPLE OF  
THE STATE OF ILLINOIS  
*ex rel.* KWAME RAOUL,  
Attorney General of Illinois

Dated: March 5, 2026

By: /s/ Ada Sandoval

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