

**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.

WONOLO, INC.

Defendant.

Case No. 2025CH07609

**COMPLAINT**

Plaintiff, the People of the State of Illinois, by Kwame Raoul, Attorney General of Illinois, brings this Complaint against Wonolo, Inc., (“Wonolo”) for violations of the Illinois Minimum Wage Law (“IMWL”), 820 ILCS 105/1 *et seq.*, and the Illinois Day and Temporary Labor Services Act (“IDTLSA”), 820 ILCS 175/1 *et seq.*

**NATURE OF THE CASE**

1. The IMWL requires employers to pay their employees at least the Illinois minimum wage then in effect. 820 ILCS 105/4(a)(1). Additionally, under the IMWL, employers must compensate their employees at a rate not less than one-and-a-half times their regular rate of pay for all the time employees work over 40 hours per week. 820 ILCS 105/4a. The IDTLSA requires employers that provide day and temporary labor services to pay their temporary laborers for four hours of work when they are assigned to work at a client company, but do not work at least four hours. 820 ILCS 175/30(g). Defendant violated these obligations.

**THE ATTORNEY GENERAL’S ENFORCEMENT AUTHORITY**

2. The Attorney General Act, 15 ILCS 205/1 *et seq.*, empowers the Attorney General to initiate legal proceedings on behalf of the People of the State of Illinois on

matters related to the payment of wages, including the provisions of the IMWL and IDTLSA. *Id.* § 6.3(b).

3. In an action brought under § 6.3 of the Attorney General Act, the Attorney General may obtain restitution and equitable relief, including any permanent or preliminary injunction, temporary restraining order, or other order, including an order enjoining the defendant from engaging in a violation. Further, the Attorney General may request, and the Court may impose civil penalties against any person or entity that violated the provisions of the IMWL or IDTLSA. *Id.* § 6.3(d).

4. Prior to filing this suit, the Attorney General investigated Wonolo and issued an investigative subpoena to Wonolo, seeking information regarding its pay practices and operations, as provided by the Attorney General Act. *Id.* § 205/6.3(c).

### **JURISDICTION AND VENUE**

5. This action is brought pursuant to § 6.3(b) of the Attorney General Act. 15 ILCS 205/6.3(b). It seeks equitable and monetary relief for violations of Section 4 and Section 4a of the IMWL, 820 ILCS 105/1 *et seq*, and Section 30, paragraph (g) of the IDTLSA. 820 ILCS 175/30(g).

6. This Court has personal jurisdiction over Wonolo because Wonolo is a foreign corporation doing business in Illinois. 735 ILCS 5/2-209(b)(4).

7. Venue is proper in Cook County because Wonolo is a corporation conducting business in Cook County. *Id.* § 5/2-102(a).

### **PARTIES**

8. 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).

9. In 2019, the General Assembly found that the welfare and prosperity of all Illinois citizens and businesses required the Attorney General's Office to establish a unit 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.

10. Wonolo, Inc. is a corporation incorporated under Delaware law. Its headquarters is 9450 SW Gemini Drive, PMB 96809, in Beaverton, Oregon. Its Illinois registered agent is the Illinois Corporation Service Company, at 801 Adlai Stevenson Drive, in Springfield, Illinois.

11. At all relevant times, Wonolo has been an "employer" as that term is defined by 820 ILCS 105/3(c) and has been a "day and temporary labor service agency" as defined by 820 ILCS 175/5.

### FACTS

12. Wonolo operates a digital application-based platform that facilitates placing workers at temporary jobs.

13. People interested in finding temporary work create profiles on Wonolo's platform. After the worker creates an account, Wonolo conducts a background check on the worker. Only if the background check is satisfactory will Wonolo allow the worker to view jobs on its platform. Wonolo refers to these workers as "Wonoloers."

14. Third-party employers contract with Wonolo to access its platform.

15. Third-party employers work with Wonolo to post work opportunities on Wonolo's platform. Wonoloers can apply for work opportunities directly through Wonolo's platform.

16. Wonolo exercised control over the work performed by the Wonoloers.

17. Wonoloers lacked opportunities to use their managerial skills to affect their profits and losses.
18. Wonoloers did not own or invest in any particular equipment.
19. Wonoloers' labor did not require specialized skills.
20. In some instances, Wonoloers worked for third-party employers for significant periods of time.
21. The work Wonoloers perform is integral to Wonolo's business. Wonolo derives its revenue from the fees it bills to third-party employers for Wonoloers' work.
22. Wonolo pays Wonoloers directly from its own funds.
23. Many Wonoloers accepted assignments through Wonolo's platform that resulted in them working more than 40 hours per workweek.
24. Wonolo failed to pay Wonoloers one-and-a-half times their regular pay rate for the hours they worked beyond 40 in one workweek.
25. Wonolo also permitted third-party employers to post job opportunities on its platform with rates of pay that were below the Illinois minimum wage, which Wonoloers would then schedule.
26. Additionally, on some occasions Wonoloers' were assigned jobs that were subsequently cancelled. Wonoloers were also assigned jobs that were scheduled to last more than four hours but ultimately lasted less than four hours. In these instances, Wonolo failed to pay these workers an amount equivalent to four hours of work.
27. Wonolo classified Wonoloers as independent contractors.

**COUNT I**  
**Violations of Illinois Minimum Wage Law – Overtime**

28. Wonolo employed Wonoloers. Wonolo exercised significant control over the manner in which Wonoloers performed their work. Wonoloers lacked an opportunity to affect their profits and losses. Wonoloers did not invest in equipment or materials. The services Wonoloers rendered required no special skills. Wonoloers worked for Wonolo for significant periods of time. Finally, the services Wonoloers rendered were integral to Wonolo's business. Therefore, Wonoloers are Wonolo's employees.

29. Wonoloers often worked more than 40 hours per workweek.

30. Wonolo violated Section 4a of the IMWL, 820 ILCS 105/4a, because it failed to compensate employees for all time worked more than 40 hours per workweek at a rate not less than one-and-one-half times the regular rate at which the employees were employed.

31. The IMWL provides for civil penalties under which employees may recover treble the amount of the underpayments and for additional damages of 5% of the amounts of the underpayments for each month following the date of payment during which the underpayments remain unpaid. 820 ILCS 105/12(a).

32. 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. Enter a judgment in the amount of all overtime wages and statutory damages due to employees to be paid to the Attorney General to be held in trust for the employees' benefit;
- c. Award the appropriate amount of monthly prejudgment interest, as provided by the IMWL;
- d. Enjoin Defendants from engaging in employment practices that violate the IMWL; and
- e. Grant such other relief that the Court deems appropriate.

**COUNT II**  
**Violations of Illinois Minimum Wage Law – Minimum Wage**

33. We reiterate the allegations made in paragraph 28 that Wonolo employed Wonoloers.

34. Through its platform, Wonolo permitted Wonoloers to take jobs that paid below the Illinois minimum wage.

35. Wonolo violated § 4(a)(1) of the IMWL, 820 ILCS 105/4(a)(1), because Wonolo failed to pay its employees Illinois' minimum wage.

36. The IMWL provides for civil penalties under which employees may recover treble the amount of the underpayments and for additional damages of 5% of the amounts of the underpayments for each month following the date of payment during which the underpayments remain unpaid. 820 ILCS 105/12(a).

37. 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. Enter a judgment in the amount of all minimum wages and statutory damages due to employees to be paid to the Attorney General to be held in trust for the employees' benefit;
- c. Award the appropriate amount of monthly prejudgment interest, as provided by the IMWL;
- d. Enjoin Defendants from engaging in employment practices that violate the IMWL; and
- e. Grant such other relief that the Court deems appropriate.

**COUNT III**  
**Violations of Illinois Day and Temporary Labor Services Act – Minimum Pay**

38. Wonolo is a day and temporary labor service agency because it contracts with third-party clients and provides day and temporary labor to third-party clients pursuant to their contracts.

39. Wonolo's third-party clients on occasion did not utilize the day or temporary laborers that Wonolo assigned to work at the third-party's worksite. On these occasions, Wonolo failed to pay the non-utilized day or temporary laborers for a minimum of four hours of pay at the agreed-upon pay rate.

40. Wonolo violated § 30(g) of the IDTLA, 820 ILCS 175/30(g) by failing to pay its day or temporary laborers a minimum of four hours of pay at the agreed-upon rate when the laborers were assigned to work at a third-party client's worksite but were not utilized.

41. 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. Enter a judgment in the amount of all owed four-hour minimum pay due to employees to be paid to the Attorney General to be held in trust for the employees' benefit;
- c. Enjoin Defendants from engaging in employment practices that violate the IDTLSA; and
- d. 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: July 22, 2025

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