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AG Watch: Illinois A Key Player In State-Level Enforcement

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This article is part of a [regular column](#) in which each installment features observations on one state's attorney general enforcement news and trends, and the compliance implications.

Since beginning his tenure in 2019, Illinois Attorney General Kwame Raoul has strategically positioned himself as a leading figure among Democratic state attorneys general.

His efforts are not merely for show; Raoul has systematically strengthened his office to advance Illinois' policy objectives and establish it as a prominent force among state regulatory bodies. Businesses operating in Illinois should heed Raoul's office and remain vigilant regarding its activities.

Many Democratic attorneys general have responded to the federal government's recent shift in enforcement priorities. Large blue states, such as California with Attorney General Rob Bonta, and New York with Attorney General Letitia James, have dedicated significant resources to opposing the Trump administration's policies and activities since January.

There is also a push by these states to fill the perceived enforcement gaps in the wake of reduced staffing and funding for the Consumer Financial Protection Bureau, U.S. Department of Housing and Urban Development, and U.S. Environmental Protection Agency, among others.

Illinois, another large blue state, is presenting itself as a leader alongside California and New York.

Illinois' 42nd Attorney General

While the press frequently notes the efforts of Bonta and James, less attention has been devoted to Raoul.

Raoul is the 42nd attorney general of Illinois, a position he has held since 2019. Prior to his tenure as attorney general, he represented Illinois' 13th Senate district, the same seat left vacant by Barack Obama in 2004 when he was elected to the U.S. Senate.

While serving as a state senator, he also worked at Quarles & Brady LLP as a partner in their labor and

employment group.

Now, in his role as attorney general, Raoul is making concerted efforts comparable to those of Bonta and James, positioning himself as a key player in state-level regulatory enforcement.

He is not only aligning his positions with those of these states, but also enhancing the capacity of the Office of the Illinois Attorney General. He is securing the necessary resources to function effectively as a regulatory authority and to attract and retain talent for achieving his long-term goals.

Through examining the actions taken by the Office of the Illinois Attorney General, a picture of how Raoul plans to raise his office's profile becomes clear.

Opposing Regulation Moves by the Trump Administration

Out of the many priorities held by the Illinois attorney general in 2025, opposing the regulatory and government action by the Trump administration is at the top of the list.

At the beginning of the year, Raoul announced his opposition to the Laken Riley Act, which mandates the detention without bond of noncitizens arrested for committing certain crimes, reflecting the administration's more aggressive stance on immigration enforcement.[1] He has taken several other stands in the field of immigration, including defending temporary protected status for immigrants from around the world.[2]

By February, Raoul joined 17 other attorneys general in *State of New York v. Trump*, filing a lawsuit in the U.S. District Court for the Southern District of New York against the Trump administration for providing Elon Musk and the Department of Government Efficiency with unauthorized access to the U.S. Department of the Treasury's central payment system, which houses many Americans' most sensitive personal information.[3]

Illinois participated in another coalition to protect the CFPB.[4] Along with 23 other attorneys general, Raoul **filed an amicus brief** before the U.S. District Court for the District of Maryland on Feb. 19, in *Mayor and City Council of Baltimore v. Consumer Financial Protection Bureau*, alleging that Trump's directive for the CFPB to stop all ongoing work and halt any future investigations harms consumers.

On Sept. 3, Raoul joined 22 other attorneys general in submitting a comment letter in opposition to the U.S. Department of Veterans Affairs' proposed federal rule eliminating abortion care and counseling at VA facilities and from VA benefits packages.[5]

Raoul filed another amicus brief on Sept. 15 in *District of Columbia v. Trump*, supporting District of Columbia Attorney General Brian Schwalb's challenge to the allegedly unlawful deployment of National Guard troops to D.C.[6] As widely reported, Chicago has also been a candidate for the deployment of federal service members.[7]

On Sept. 24, Raoul sought a preliminary injunction along with 22 other attorneys general in *California v. U.S. Department of Health and Human Services*, to prevent the Trump administration from enforcing the defund provision found in the recently enacted federal budget reconciliation law, which would prohibit Medicaid

reimbursements to facilities that provide abortion care.[8]

Substantive Actions

While Raoul has been busy developing the bona fides to join New York and California as a leading state opposing the enforcement priorities and government actions of the Trump administration, he continues to pursue state-level law enforcement objectives.

These objectives arise in areas concerning labor and wages, unfair or deceptive acts and practices, fraud on the government, and environmental matters.

Considering Raoul's background as an attorney practicing labor and employment law, it is no shock that his office aggressively pursues labor-related issues. Many of the cases prosecuted by Raoul's office involve failure to pay overtime,[9] failure to pay fair wages,[10] or wage-fixing practices.[11]

Efforts have been made to protect workers on the macro level as well. Between March and April, Raoul took three separate efforts to safeguard the National Labor Relations Board and its ability to protect American workers' right to unionize.[12]

Right before the Labor Day weekend, Raoul published a new report, highlighting efforts taken to protect Illinois workers.[13] The report expounds upon Raoul's achievements in this regard, including those of the Workplace Rights Bureau of the Attorney General's Office, which has collected "more than \$27 million in owed wages and restitution for workers and collected \$935,000 in penalties against companies alleged to have discriminated against workers on the basis of race or sex" since it was created in 2020.[14]

Raoul also closed several high-profile matters in 2025.

Alternative retail energy suppliers have been a focus of this administration. Raoul recently secured a \$12 million settlement from Direct Energy Services LLC in April and an \$8.4 million settlement from Clearview Energy Inc. in September.[15]

At the end of 2024, in collaboration with the FTC, Raoul obtained an \$11.25 million settlement with DoorDash for alleged unfair and deceptive acts and practices.[16] On May 22, the Trump International Hotel settled an environmental matter involving the discharge of water into the Chicago River for \$4.8 million.[17]

Despite his recent focus on opposing the Trump administration, Raoul continues to pursue bread-and-butter attorney general matters in Illinois. He is expected to maintain this focus at an increased pace as he aims to expand the size and quality of the legal talent pool of the Office of the Illinois Attorney General to pursue his objectives.

Interstate Collaboration

Raoul has also prioritized interstate collaboration to achieve shared policy objectives. With lowered federal regulatory activity comes increased state regulatory activity. One way for states to match the resources and

effectiveness of federal regulation is by combining their knowledge and resources to achieve a similar level of effectiveness.

As evidenced by the numerous coalitions, attorneys general have discovered that concentrating the power of various attorneys general is an effective enforcement tool. While states have been collaborating for more than 30 years in enforcement actions and litigation, they are increasingly doing so in the modern era with greater effect.

Raoul's collaborative focus has not been exclusively on opposition to the federal government. He has also engaged in bipartisan collaboration efforts.

For example, in January, Raoul announced a coordinated action with nine attorneys general against disposable e-cigarette producers and distributors. This coalition has sent letters, served subpoenas and civil investigative demands, and filed lawsuits against e-cigarette retailers, including Raoul's suit, *Illinois v. Chicago Merchandise Co.*, filed on Jan. 16.[\[18\]](#)

In August, Raoul also joined a bipartisan coalition of 22 state attorneys general who sent a comment letter to the Centers for Disease Control and Prevention and HHS to support continuation of the National Youth Tobacco Survey, which is an annual study to assess the use of smoking and vaping among middle and high school students.[\[19\]](#)

Office Growth

One signal that Raoul is intent on increasing the profile of the office is his effort to expand it. Since 2019, Raoul has made headway toward increasing the quantity and improving the quality of lawyers employed by the Office of the Illinois Attorney General.

Between the fiscal years of 2016 and 2025, the Illinois state budgets reveal a notable increase in the agency's submitted headcount. From 2016 to 2020, the actual headcount remained constant at 760 employees.

However, the Illinois state budget for 2026 sets an ambitious target, aiming for a headcount of 877 employees by the end of fiscal year 2026. This represents a 23.3% increase from the previously stagnant numbers observed between 2016 and 2020.[\[20\]](#)

The office is looking to fill 45 attorney positions.[\[21\]](#) These positions are located throughout the state in a wide range of divisions, including consumer fraud, environmental enforcement, high-tech crimes, Medicaid fraud, privacy and data security, workplace rights, and many more.

Not only is Raoul hiring more attorneys than ever before, but the state has also substantially increased salaries to retain them. Most full-time assistant attorney general positions across the state now come with an annual compensation ranging from \$82,000 to \$107,550.[\[22\]](#) Complex litigation counsel positions are posted with a yearly salary range of \$110,000 to \$140,000.[\[23\]](#) Roles also include robust benefits.

These salary bands are significantly higher than they were prior to Raoul's tenure. In 2016, the highest paid assistant attorney general received \$84,480, and the highest paid complex litigation counsel received \$83,256,

both of which are right around or well below the minimum salary for the roles today.[24]

In 2017, wages for various assistant attorney general positions started at \$57,000.[25] As a former legislator, Raoul has been largely successful in securing legislative support, and it seems he has materially improved the resourcing of his office for the long term.

By making these changes, Raoul is planning for a future of more robust enforcement activity and to attract and retain legal talent to carry out objectives. By seeking growth opportunities, both internally through new hires and externally through more frequent collaboration with other state attorney general offices, Raoul's office will be better equipped to handle substantive enforcement issues, as well as complex investigations and litigation.

Recommendation for Companies Operating in Illinois

Companies operating in Illinois should be aware that Raoul is strengthening his office to address perceived regulatory gaps in federal oversight, particularly in sectors such as consumer finance, energy, the environment and consumer protection.

Democratic attorneys general, including Raoul, are expected to creatively leverage existing state laws, such as unfair or deceptive acts or practices, and federal laws with parallel enforcement authority, like the Health Insurance Portability and Accountability Act, Consumer Financial Protection Act, and Children's Online Privacy Protection Act, to regulate businesses.

Additionally, attorneys general are likely to continue using state antitrust and environmental protection laws to pursue the largest companies. As the regulatory landscape evolves over the coming years, we may even see increased legislative activity aimed at providing regulators with additional resources and enforcement tools.

Given Raoul's focus on labor-related issues, companies with workers in Illinois must be diligent in complying with state-specific labor laws and regulations. Some exemplar areas to focus on are as follows.

Minimum Wage Compliance

Ensure that the company's pay structure meets or exceeds Illinois' minimum wage requirements, which are higher than the federal minimum wage.

Employee Breaks and Rest Days

Illinois mandates breaks and at least one day of rest for all employees. It's crucial to incorporate these requirements into scheduling and human resources policies.

Worker Classification

Properly classify workers according to Illinois law to avoid misclassification issues, which can lead to legal complications and penalties.

Temporary and Contract Workers

The Illinois Day and Temporary Labor Services Act requires that temporary workers who work a certain number of hours annually receive the same benefits as full-time employees. Ensure your company policies reflect this requirement.

Accessibility and Leave Laws

Stay updated on Illinois' leave and accessibility laws to ensure compliance, including family leave and disability accommodations.

As Raoul has an aggressive enforcement stance, companies should regularly review their compliance with these labor laws to mitigate risks.

Raoul is also expected to continue actively enforcing consumer protection laws, including the Illinois Consumer Fraud and Deceptive Business Practices Act. He frequently targets specific industries, such as alternative retail energy suppliers, to influence industry practices.

Some of the consumer protection issues that Raoul has focused on include the following.

Undisclosed Fees

Raoul aggressively targets companies lacking transparency in their pricing before consumers enter the "checkout" phase of a purchase. Companies should ensure transparent pricing and avoid charges that could be considered junk fees.

Misleading Statements

Companies offering products and services to consumers that fail to fulfill promises face increased scrutiny. Illinois businesses should ensure marketing claims are substantiated and clear, with no misleading statements.

Credit Practices

As a supporter of the Predatory Loan Prevention Act, Raoul targets high-interest consumer credit providers. Claims under the act often accompany consumer protection claims, particularly if loan terms are concealed or consumers are perceived to have been misled about any promotional period or the specific terms of repayment.

Lenders should review the Predatory Loan Prevention Act and adhere to state usury laws and disclosure requirements as applicable.

Conclusion

As attorneys general in both red and blue states react to the changing federal agency priorities, particularly the Federal Trade Commission and CFPB, state attorneys general will fill the perceived void by directing the allocation

of resources based on their state-level constituency and personal/professional priorities.

It is inevitable that attorneys general use their scarce resources in ways that are different from one another, potentially widening regulatory differences between states. As this trend continues, it will likely lead to more varied compliance requirements.

This evolving landscape will complicate national compliance strategies for companies operating in multiple jurisdictions. Businesses must stay informed about local regulatory changes and ensure compliance across different regions, as regulations and enforcement priorities can vary significantly.

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