

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

LASHUNDA LONG, individually and on
behalf of others similarly situated,

Plaintiff,

v.

ACCENTURE LLP

Defendant.

COLLECTIVE ACTION COMPLAINT

Jury Trial Demanded

Civil Case No.:

COLLECTIVE ACTION COMPLAINT

Plaintiff LASHUNDA LONG (“Plaintiff”), individually and on behalf of all others similarly situated, by and through her attorneys, BROWN, LLC, upon personal knowledge as to herself and upon information and belief as to other matters, alleges as follows:

INTRODUCTION

1. This is a collective action on behalf of Plaintiff and all others similarly situated who worked for Accenture LLP (“Defendant” or “Accenture”) as hourly-paid, non-exempt employees and were unlawfully denied wages for all hours worked and overtime compensation in violation of the Fair Labor Standards Act (“FLSA”), 29 U.S.C. § 201 *et seq.*

2. Defendant violated the FLSA by failing to credit and pay employees for all compensable work time performed, including by requiring or permitting employees to perform work off the clock or otherwise outside the time credited for compensation, resulting in unpaid straight time and unpaid overtime hours in excess of forty (40) in a workweek.

3. Plaintiff brings this action pursuant to 29 U.S.C. § 216(b) of the FLSA, individually and on behalf of a putative “FLSA Collective,” defined as:

All hourly-paid, non-exempt employees employed by Defendant in the United States or any other place covered by the FLSA at any time within the three (3) years preceding the filing of this action through the date of final judgment.

4. Plaintiff brings this action individually and on behalf of all putative FLSA Collective members who elect to opt in to this action pursuant to the FLSA, 29 U.S.C. § 216(b), to recover unpaid wages and overtime compensation unlawfully withheld by Defendant, liquidated damages as provided by 29 U.S.C. § 216(b), and reasonable attorneys' fees and costs.

5. Plaintiff also brings individual claims under Title VII of the Civil Rights Act of 1964 ("CRA") for sexual harassment and retaliation. Plaintiff was subjected to unwelcome physical contact and sexual harassment by her supervisor. After Plaintiff reported the harassment, Defendant subjected her to adverse treatment, including actions affecting her work assignments and employment status.

JURISDICTION AND VENUE

6. This Court has subject-matter jurisdiction over this action pursuant to 28 U.S.C. § 1331 because Plaintiff's claims arise under federal law, including the FLSA, 29 U.S.C. § 201 *et seq.*, and the CRA, 42 U.S.C. § 2000e *et seq.*

7. This Court has personal jurisdiction over Defendant Accenture LLP because it is domiciled in the State of Illinois.

8. Venue is proper in this District pursuant to 28 U.S.C. § 1391 because Defendant resides in this District.

PARTIES

Defendant

9. Defendant Accenture LLP is a limited liability partnership organized and existing under the laws of the State of Illinois, with its principal office located at 500 W. Madison Street, Chicago, Illinois 60661.

10. Defendant's registered agent for service of process in Illinois is Corporate Creations Network Inc., located at 1320 Tower Road, Schaumburg, Illinois 60173.

11. Defendant provides consulting and related professional services nationwide. During the relevant time period, Defendant employed Plaintiff and members of the FLSA Collective as hourly-paid, non-exempt employees.

Plaintiff

12. Plaintiff Lashunda Long is a resident of Fulton County, Georgia.

13. Plaintiff was employed by Defendant as an hourly-paid, non-exempt employee beginning in or about March 2025 through her separation from employment in or about November 2025.

FACTUAL ALLEGATIONS¹

14. Defendant is an "employer" within the meaning of the FLSA, 29 U.S.C. § 203.

15. Defendant operates an enterprise engaged in commerce or in the production of goods for commerce within the meaning of the FLSA.

16. Defendant operates an enterprise that had two or more employees handling, selling, or otherwise working on goods or materials that had been moved in or produced for commerce.

17. Defendant operates an enterprise with an annual gross volume of sales made or business done in excess of \$500,000.

¹ The allegations in this Complaint, unless otherwise specified, refer to the time period of three years prior to the filing of this action through the date of judgment.

18. Plaintiff and other hourly-paid, non-exempt employees regularly engage in interstate commerce, including performing consulting and implementation services for clients across state lines and accessing systems and communications that operate in interstate commerce.

19. Defendant is an “employer” within the meaning of the CRA.

20. Plaintiff was an “employee” of Defendant within the meaning of the CRA.

Accenture’s Employment and Pay Practices

21. Hourly-paid, non-exempt employees perform client-facing work and project support work for Defendant, including Epic-related analyst work and go-live support functions.

22. Hourly-paid, non-exempt employees access Defendant systems and perform assigned tasks as part of their work, including tasks performed before and after scheduled shifts to be ready to perform required job duties.

23. Hourly-paid, non-exempt employees are paid on an hourly basis and are classified by Defendant as non-exempt.

24. Hourly-paid, non-exempt employees are assigned to projects and workstreams by Defendant, and Defendant controls their work assignments, performance expectations, and deadlines.

25. Hourly-paid, non-exempt employees are required to comply with Defendant’s timekeeping and payroll procedures, and Defendant maintains the ability to review, approve, and process recorded time and pay.

FLSA Violations

26. Defendant employs hourly-paid, non-exempt employees.

27. Defendant regularly suffers and permits hourly-paid, non-exempt employees to work more than forty (40) hours per workweek.

28. Defendant maintains timekeeping and payroll practices that result in hourly-paid, non-exempt employees not being paid for all compensable work time performed and not receiving overtime premium compensation for hours worked in excess of forty (40) in a workweek.

29. Defendant restricts the time credited for compensation, including by using preset, prefilled, or otherwise standardized time entries that do not necessarily reflect all compensable work time actually performed.

30. Defendant discourages, rejects, or does not fully approve deviations from preset or standardized time entries when employees attempt to report additional compensable work time, including overtime hours.

31. Defendant requires or permits hourly-paid, non-exempt employees to perform compensable work outside the time credited for compensation, including work performed before scheduled start times, after scheduled end times, and during periods of heightened project activity.

32. As a result of Defendant's timekeeping and payroll practices, hourly-paid, non-exempt employees who work more than forty (40) hours in a workweek are not paid overtime compensation at one and one-half (1.5) times their regular rate of pay for all overtime hours worked.

33. Defendant's timekeeping and payroll practices prioritize internal limits and approval practices over accurate recording and payment of all compensable work time actually performed.

34. Defendant has actual or constructive knowledge that hourly-paid, non-exempt employees perform compensable work beyond the time credited for compensation and beyond forty (40) hours in some workweeks, yet fails to ensure that all such time is recorded and paid at the proper overtime rate.

35. Defendant knew, or recklessly disregarded, that its timekeeping and payroll practices resulted in employees not being paid proper overtime compensation under the FLSA.

Sexual Harassment

36. Plaintiff was subjected to unwelcome physical contact and sexual harassment by a supervisor while employed by Defendant.

37. The unwelcome physical contact was sexual in nature.

38. Plaintiff reported the unwelcome physical contact and sexual harassment through Defendant's internal channels, including by submitting a formal complaint.

39. After Plaintiff reported the harassment, Defendant failed to take prompt and effective action reasonably calculated to end the harassment and prevent its recurrence.

40. Instead, Plaintiff experienced workplace harm after reporting, including increased scrutiny and adverse treatment connected to her work assignments and employment status.

Retaliation

41. Plaintiff engaged in protected activity by reporting unwelcome physical contact and sexual harassment through Defendant's internal channels, including by submitting a formal complaint.

42. After Plaintiff reported the harassment, Defendant subjected Plaintiff to materially adverse actions that would dissuade a reasonable employee from making or supporting a complaint of sexual harassment.

43. Defendant's retaliatory actions included increased scrutiny of Plaintiff's work, adverse changes affecting Plaintiff's work assignments and work opportunities, and actions affecting Plaintiff's employment status.

44. Defendant's retaliatory actions occurred close in time to Plaintiff's protected activity and were causally connected to Plaintiff's complaints, as reflected in the timing of the adverse actions following Plaintiff's report.

45. Defendant ultimately separated Plaintiff from employment after Plaintiff engaged in protected activity.

46. Defendant's retaliatory actions were intentional and taken because Plaintiff opposed and reported conduct that Plaintiff reasonably believed violated the CRA.

EEOC Charge and Exhaustion

47. Plaintiff attempted to pursue administrative relief for her CRA claims by submitting an EEOC Public Portal inquiry that identified Defendant and described the discrimination, harassment, and retaliation at issue.

48. The inquiry stated that Plaintiff sought to file a charge on or before the applicable deadline to avoid any potential lapse of the EEOC filing deadlines.

49. The inquiry identified counsel and included contact information for Plaintiff and counsel.

50. After submitting the inquiry, Plaintiff repeatedly attempted to schedule the required EEOC interview through the EEOC scheduling system, but the system reported that all appointment times were reserved and instructed her to check back later.

51. Plaintiff also attempted to follow up with the EEOC by telephone and through continued efforts to secure an interview appointment.

52. Plaintiff continued to document these efforts to proceed through the EEOC process.

53. The EEOC scheduling system did not provide Plaintiff with an interview appointment despite Plaintiff's repeated attempts.

54. Plaintiff's EEOC Public Portal inquiry objectively manifests Plaintiff's intent to activate the EEOC administrative process and to file a charge, including by expressly stating an intent to file by the deadline, identifying Defendant, describing the harassment and retaliation, and identifying counsel. Plaintiff's repeated efforts to schedule the required EEOC interview further confirm Plaintiff's intent to proceed.

55. Plaintiff thereafter filed a formal Charge of Discrimination with the Equal Employment Opportunity Commission asserting claims for sex discrimination, sexual harassment, and retaliation.

COLLECTIVE ACTION ALLEGATIONS

56. Plaintiff brings this action as a collective action pursuant to 29 U.S.C. § 216(b) on behalf of herself and all other putative members of the FLSA Collective who elect to opt in.

57. The FLSA Collective is similarly situated because Defendant subjects Plaintiff and other hourly-paid, non-exempt employees to common timekeeping and payroll practices that determine the hours credited for compensation and result in unpaid straight time and unpaid overtime.

58. These practices include limiting the time credited for compensation, requiring or permitting compensable work to be performed outside the time credited for compensation, and failing to pay overtime compensation for hours worked in excess of forty (40) in a workweek.

59. Defendant applies these policies and practices in a uniform manner to hourly-paid, non-exempt employees, and Defendant maintains centralized control over timekeeping rules, payroll processing, and the review and approval of recorded time.

60. The claims of Plaintiff and the FLSA Collective can be adjudicated through common proof, including Defendant's timekeeping and payroll policies, payroll and time records, and testimony regarding Defendant's expectations and practices for pre-shift and post-shift work.

61. Plaintiff will fairly and adequately represent the interests of the FLSA Collective and has retained counsel experienced in FLSA collective action litigation.

62. Plaintiff requests that the Court authorize issuance of notice to the FLSA Collective and order Defendant to produce the names, last known mailing addresses, email addresses, telephone numbers, dates of employment, job titles, and work locations for all potential opt-in members so that notice may be timely and effectively disseminated.

63. Plaintiff seeks conditional certification of the FLSA Collective, court-authorized notice to similarly situated employees, and an opportunity for such employees to opt in to this action.

COUNT I
(On Behalf of Plaintiff and the FLSA Collective)
Violation of the FLSA 29 U.S.C. § 201 et seq.
Unpaid Wages and Overtime

64. Plaintiff re-alleges and incorporates all previous paragraphs herein.

65. 29 U.S.C. § 207(a)(1) provides:

[N]o employer shall employ any of his employees who in any workweek is engaged in commerce or in the production of goods for commerce, or is employed in an enterprise engaged in commerce or in the production of goods for commerce, for a workweek longer than forty hours unless such employee receives compensation for his employment in excess of the hours above specified at a rate not less than one and one-half (1.5) times the regular rate at which he is employed.

66. Plaintiff and the FLSA Collective work more than forty (40) hours in one or more workweeks.

67. Defendant has a policy and practice of failing to pay Plaintiff and the FLSA Collective for all compensable work time performed, including by requiring or permitting work to be performed outside the time credited for compensation.

68. As a result of Defendant's policies and practices, Defendant fails to pay Plaintiff and the FLSA Collective for all compensable work time performed and fails to pay overtime compensation at one and one-half (1.5) times their regular rate of pay for all hours worked over forty (40) in a workweek.

69. Defendant's violations of the FLSA are willful.

70. As a result of Defendant's FLSA violations, Defendant is liable to Plaintiff and the FLSA Collective for unpaid wages and overtime compensation, an additional equal amount as liquidated damages, reasonable attorneys' fees and costs, and such other relief as the Court deems just and proper pursuant to 29 U.S.C. § 216(b).

COUNT II
(On Behalf of Plaintiff Only)
Violation of the CRA 42 U.S.C. § 2000e et seq.
Sexual Harassment and Hostile Work Environment

71. Plaintiff re-alleges and incorporates all previous paragraphs herein.

72. 42 U.S.C. § 2000e-2 provides:

It shall be an unlawful employment practice for an employer ... to fail or refuse to hire or to discharge any individual, or otherwise to discriminate against any individual with respect to his compensation, terms, conditions, or privileges of employment, because of such individual's race, color, religion, sex, or national origin.

73. Plaintiff was subjected to unwelcome physical contact and sexual harassment because of her sex.

74. The harassment was severe or pervasive and altered the terms and conditions of Plaintiff's employment, creating a hostile work environment.

75. Plaintiff reported the sexual harassment through Defendant's internal reporting channels, including by submitting a formal complaint.

76. Defendant knew or should have known of the harassment and/or is responsible for the harassment under principles of agency and failed to take prompt and effective remedial action reasonably calculated to end the harassment and prevent its recurrence.

77. Plaintiff has satisfied all conditions precedent to bringing the CRA claims, or such conditions have been waived, excused, or tolled.

78. As a result of Defendant's unlawful conduct, Plaintiff has suffered damages and is entitled to recover all available relief under the CRA, including compensatory damages, punitive damages, equitable relief, attorneys' fees, and costs.

COUNT III
(On Behalf of Plaintiff Only)
Violation of the CRA 42 U.S.C. § 2000e et seq.
Retaliation

79. Plaintiff re-alleges and incorporates all previous paragraphs herein.

80. 42 U.S.C. § 2000e-3(a) provides:

It is an unlawful employment practice for an employer to discriminate against an employee because she has opposed a practice made unlawful by Title VII or because she has made a charge, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under Title VII.

81. Plaintiff engaged in protected activity by opposing and reporting conduct that Plaintiff reasonably believed constituted unlawful sexual harassment and discrimination, including by reporting the harassment through Defendant's internal channels and submitting a formal complaint.

82. After Plaintiff engaged in protected activity, Defendant subjected Plaintiff to materially adverse actions that would dissuade a reasonable employee from making or supporting a complaint of discrimination or harassment.

83. Defendant ultimately separated Plaintiff from employment following Plaintiff's protected activity.

84. Defendant's retaliatory actions included increased scrutiny of Plaintiff's work, adverse changes affecting Plaintiff's work assignments and work opportunities, and actions affecting Plaintiff's employment status, culminating in Plaintiff's separation from employment.

85. Defendant's retaliatory actions occurred close in time to Plaintiff's protected activity and were causally connected to Plaintiff's complaints.

86. Defendant's retaliatory actions were intentional and taken because Plaintiff engaged in protected activity.

87. Plaintiff has satisfied all conditions precedent to the extent required, or such conditions have been waived, excused, or tolled.

88. As a result of Defendant's unlawful conduct, Plaintiff has suffered damages and is entitled to recover all available relief under the CRA, including compensatory damages, punitive damages, equitable relief, attorneys' fees, and costs.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, individually and on behalf of the FLSA Collective, respectfully requests that the Court enter judgment in her favor and against Defendant and award the following relief:

- A. Conditional certification of this action as a collective action under 29 U.S.C. § 216(b) on behalf of the FLSA Collective, and authorization of notice to similarly situated employees;
- B. Appointment of Plaintiff's counsel as counsel for the FLSA Collective;
- C. A declaratory judgment that Defendant's policies and practices violated the FLSA and the CRA;
- D. Appropriate injunctive and equitable relief, including relief requiring Defendant to credit and pay for all compensable work time performed and to properly pay overtime compensation, and such other equitable relief as may be appropriate under the CRA;
- E. An award of unpaid straight-time wages and overtime compensation to Plaintiff and members of the FLSA Collective, in amounts to be determined;
- F. An award of liquidated damages to Plaintiff and members of the FLSA Collective pursuant to 29 U.S.C. § 216(b);
- G. An award of all relief available to Plaintiff under the CRA, including compensatory damages, punitive damages, and equitable relief as appropriate;
- H. Pre-judgment and post-judgment interest as permitted by law;
- I. An award of reasonable attorneys' fees and costs pursuant to 29 U.S.C. § 216(b), 42 U.S.C. § 2000e-5(k), and any other applicable authority;
- J. Such other and further relief as the Court deems just and proper.

JURY DEMAND

Plaintiff, individually and on behalf of all others similarly situated, by and through her attorneys, hereby demands a trial by jury pursuant to Rule 38 of the Federal Rules of Civil

Procedure and the court rules and statutes made and provided with respect to the above-entitled cause.

Dated: March 16, 2026

By: /s Jason T. Brown
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