

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

COUNTY DEPARTMENT, CHANCERY DIVISION

LOCITE SMITH, BARBARA JEAN
MCGEE, BRIAN WILLIAMS,
KANESHA SMITH, TREVONTE
NEVILLE, TAMAL MILLER,
MICHAEL CRAY, MICHELLE
AYALA, CHARIDY YOUNG,
DONALD LORICK, on behalf of
themselves and all others similarly
SITUATED,

Plaintiffs,

vs.

OVIDIU ASTALUS; GO LOGISTICS, INC.;
ONESOURCE LOGISTICS INC; 4TRANS INC.;
CROWN POINT LOGISTICS LLC; SYNY LOGISTICS
INC.; CROWN POINT TRUCK AND TRAILER SALES
INC.; ZUBA LOGISTICS LLC; CROWN POINT
TRUCK AND TRAILER REPAIR CENTER INC.; and
DOES 1 through 50, inclusive,

Defendants

Case No.: 2024CH02855

Judge Pamela McLean Meyerson

**[PROPOSED] NOTICE AND CONSENT TO SUE IN
CONNECTION WITH PLAINTIFFS' MOTION FOR
CIRCULATION OF NOTICE
PURSUANT TO 29 U.S.C. § 216(B)**

**[PROPOSED]
NOTICE OF PENDING COLLECTIVE ACTION LAWSUIT
UNDER THE FAIR LABOR STANDARDS ACT**

Please read this notice carefully.

- To:** All truck drivers for Ovidiu Astalus and his wholly-owned companies Go Logistics, Inc.; Onesource Logistics, Inc.; 4trans, Inc.; Crown Point Logistics LLC; SYNY Logistics Inc.; Crown Point Truck And Trailer Sales Inc.; Zuba Logistics LLC; Crown Point Truck And Trailer Repair Center Inc. and other companies owned or managed by Ovidiu Astalus including DAJ Transport LLC (collectively the "Crown Point Defendants) who drove for him any time since April 4, 2021.
- Re:** Potential violations of the Fair Labor Standards Act, 29. U.S.C. § 207, by Ovidiu Astalus and his wholly-owned companies and related corporate affiliates (collectively "Crown Point Defendants").

I. Why am I receiving this notice?

You have been identified as a current or former driver for the Crown Point Defendants who may be able to participate in a lawsuit against them ("Lawsuit").

The purpose of this Notice is to give you an opportunity to join Plaintiffs' Lawsuit.

Plaintiffs' Lawsuit is a "collective action," which means the claims of participating employees are decided in a single court proceeding. Under the Fair Labor Standards Act (the "FLSA"), employees must consent to join the "collective action" to have their claims decided.

II. Who is sending me this notice and why?

This notice is not from the Court in the Lawsuit. It is from RAFII & Associates, P.C., Willenson Law LLC and a third-party administrator called CPT Group, Inc. The lawsuit is in the Cook County Circuit Court, Chancery Division in Illinois. The Court has authorized this notice being sent, but the Court has not taken any position on the merits of the Plaintiffs' claims or whether the Crown Point Defendants have any defenses.

III. What is this lawsuit about?

This lawsuit was filed by ten former drivers ("Plaintiffs" or "Drivers"): Locite Smith, Barbara Jean McGee, Brian Williams, Kanesha Smith, Trevonte Neville, Tamal Miller, Michael Cray, Michelle Ayala, Charidy Young, and Donald Lorick on April 4, 2024 against Ovidiu Astalus and his wholly-owned companies including Go Logistics, Inc.; Onesource Logistics, Inc.; 4trans, Inc.; Crown Point Logistics LLC; SYNY Logistics Inc.; Crown Point Truck And Trailer Sales Inc.; Zuba Logistics LLC; Crown Point Truck And Trailer Repair Center Inc.; and any other corporation wholly-owned or majority-owned by Ovidiu Astalus since April 4, 2021 (together, the "Crown Point Defendants").

In this Lawsuit, Plaintiffs allege that the Crown Point Defendants failed to pay them as required by the FLSA. The Drivers claim that they are owed wages because of deductions made to their pay, because of uncompensated time they spent working for the Crown Point Defendants, because of nonpayment of wages and because of deductions from their pay. The Drivers claim that they are owed overtime for hours spent driving over forty hours in a week, because they were treated as employees. Finally, the lawsuit also seeks an amount equal to employees' unpaid wages and unpaid overtime wages as liquidated ("double") damages.

IV. Will I lose my job if I join this lawsuit?

If you join the Lawsuit, federal law prohibits Ovidiu Astalus and his companies from retaliating against you because of your participation. This means that Ovidiu Astalus and his companies cannot terminate, discipline, or harass you in any way for participating in the Lawsuit.

V. How do I join the Lawsuit?

If you wish to join the Lawsuit, you should complete the Consent to Join form www.AstalusWageClaim.com and submit it by clicking the "Submit Consent to Join Form" button.

You may also choose to participate in this Lawsuit by hiring separate counsel and having them file notice with the Court by August 13, 2025, or by filing a pro se notice with the Court by this deadline.

You must submit your Consent to Join before the deadline. If you do not complete and mail a Consent to Join form on or before the August 13, 2025 deadline, you may not be allowed to participate as a party to the Lawsuit.

VI. What is the effect on me if I join the Lawsuit?

You will become a plaintiff in this Lawsuit and you will be represented by the law firm(s) identified in Section VIII below. You will be bound by any decision of the Court, whether favorable or unfavorable. If the Lawsuit is successful, you may be eligible for a money payment. If the Lawsuit is unsuccessful, you will receive nothing.

VII. What if I do not join the Lawsuit?

If you do not join the Lawsuit, you will not be affected by any judgment or settlement rendered in the Lawsuit, which means you will not be eligible for a money payment under this Lawsuit. You may have the right to file your own lawsuit. Note: The FLSA statute of limitations continues to run on your potential wage claims until: (a) you timely

file your own lawsuit to collect unpaid wages; (b) you timely execute and return the attached Consent to Join this Lawsuit; or (c) you timely join this Lawsuit by hiring your own separate counsel or by filing a pro se notice with the Court to represent yourself.

VIII. Who will be representing me if I join?

If you Consent to Join this Lawsuit, you will be represented by the following law firm (“Law Firm”):

Rachel Mariner, RAFII & ASSOCIATES, P.C.
1120 N. Town Center Dr., Ste. 130
Las Vegas, Nevada 89144
(725) 245-6056
www.rafiilaw.com

You will also be represented by local counsel (“Local Counsel”):

Marni Willenson, WILLENSON LAW LLC
3420 West Armitage, Ste. 200
Chicago, IL 60647
(312) 508-5380
www.willensonlaw.com

The Law Firm has agreed to represent Plaintiffs on a contingency basis, which means if there is no recovery from the Lawsuit, then the Law Firm will not receive any attorneys’ fees. You will not be charged hourly attorneys’ fees. If the Lawsuit results in a recovery, then the Law Firms will ask the Court to award or approve reasonable attorneys’ fees and costs.

IX. What if I have more questions?

You may obtain further information about this Notice by contacting the Law Firm listed above or by emailing wagetheft@rafiilaw.com or AstalusWageClaim@cptgroup.com. Do not contact the Court about this Notice.

X. If I want to participate, what do I do next?

Go to www.AstalusWageClaim.com to send your consent to sue before the deadline.
