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**STATE OF WASHINGTON  
KING COUNTY SUPERIOR COURT**

STATE OF WASHINGTON,

NO.

Plaintiff,

## COMPLAINT

V.

**TAGLE INVESTMENTS, LLC, dba  
PARADISE ESPRESSO; and  
JONATHAN TAGLE in his individual  
capacity.**

Defendants.

## I. INTRODUCTION

1. The State of Washington (State), by and through its undersigned attorneys, brings this action against Tagle Investments, LLC, doing business as Paradise Espresso (Paradise Espresso), and Jonathan Tagle (Tagle) to enforce the Washington Law Against Discrimination (WLAD), RCW 49.60.030(1)(a), 49.60.180, and 49.60.210, for discriminating against multiple female employees on the basis of sex by sexually harassing them, retaliating against them when they resisted or complained, and constructively discharging them from employment. Defendants further failed to pay employees the minimum wage for all hours worked and to pay all tips, in violation of the Washington Minimum Wage Act (“MWA”) RCW 49.46.020 and the Wage Rebate Act (“WRA”) RCW 49.52.050, and failed to pay employees on a regularly established pay day at no longer than monthly intervals, in violation of Washington Administrative Code

1 (“WAC”) 296–128–035(3). Finally, Defendants deprived employees of the right to accrue and  
2 take paid sick leave as guaranteed by Washington’s Paid Sick Leave law (“PSL”) in violation of  
3 RCW 49.46.020, 49.46.200, and 49.46.210, and failed to notify employees of their entitlement  
4 to paid sick leave, in violation of WAC 296–128–755.

5 2. The State brings this action to prevent and remedy harm to Washington residents  
6 from Defendants’ sexual harassment, retaliation, constructive discharge, failure to pay required  
7 wages, failure to pay wages on a regular interval, and failure to provide and notify employees of  
8 their entitlement to mandatory sick leave.

## 9 II. JURISDICTION AND VENUE

10 3. The Attorney General is authorized to commence this action pursuant to  
11 RCW 43.10.030(1).

12 4. Subject matter jurisdiction is proper in this Court pursuant to RCW 2.08.010,  
13 RCW 7.24.010, and RCW 7.24.020 because this is an action alleging state law violations and  
14 seeking declaratory and injunctive relief.

15 5. Pursuant to RCW 4.12.020 and RCW 4.12.025, venue properly lies in King  
16 County because some part of the events giving rise to this action occurred in King County, and/or  
17 Defendants have done and continue to do business in King County.

## 18 III. THE PARTIES

19 6. Plaintiff is the State of Washington.

20 7. The Attorney General is the chief legal adviser to the State. RCW 43.10.030(1)  
21 authorizes the Attorney General to act in state court on matters of public concern. Defendants’  
22 sex discrimination and retaliation against female employees, and failure to pay wages and  
23 benefits required by state law, are matters of public concern. RCW 49.60.010; RCW 49.46.005.  
24 Therefore, the Attorney General is authorized to commence this action.

25 8. Defendant Tagle Investments, LLC, dba Paradise Espresso, is a registered  
26 Washington corporation whose stated business is provision of food and beverages.

9. Defendant Jonathan Tagle is the sole owner and operator of Tagle Investments, LLC, dba Paradise Espresso, and is directly involved in hiring, supervising, scheduling, and compensating his employees, among other operations. Jonathan Tagle serves as the sole Governor and corporate officer of Tagle Investments.

10. At all relevant times, Tagle Investments, LLC has been a registered Washington corporation doing business in Washington State and having eight (8) or more employees.

11. At all relevant times, Tagle Investments, LLC, has been an “employer” within the meaning of RCW 49.60.040(11) and RCW 49.46.010.

## IV. ALLEGATIONS

12. Defendants own and operate four (4) retail “bikini barista” coffee stands, under the name “Paradise Espresso.” The coffee stands are located in Tukwila, Monroe, Lynnwood, and Mountlake Terrace.

13. Defendants hire young women to work as baristas in their retail coffee stands, making and selling coffee drinks for a largely male clientele, while dressed in bikinis, lingerie, or similar attire.

14. At all relevant times, Jonathan Tagle has been the corporate officer of Tagle Investments, LLC, and has served as the sole manager responsible for the day-to-day operations at all Paradise Espresso locations.

15. As the corporate officer and sole manager of Tagle Investments, LLC, Jonathan Tagle oversaw operations at Paradise Espresso retail coffee stands and had the authority to hire employees, make job assignments, set work schedules, set wages, pay employees, provide employee benefits, and/or fire employees.

### A. Defendants Subjected Female Employees to Egregious Sexual Harassment

16. From at least 2012 to at least November 2024, Defendants subjected female employees to unlawful discrimination on the basis of sex, including quid pro quo sexual harassment and/or severe or pervasive, unwelcome sexual conduct that gave rise to a hostile

1 work environment. For instance, Tagle:

- 2 a. Required female employees to engage in sexual acts in order to be hired, keep
- 3 their jobs, and/or be given better hours, shifts, or work locations;
- 4 b. Required female applicants to get naked in front of him during their job
- 5 interviews;
- 6 c. Requested that female employees or applicants jump or bend over in front of
- 7 him while naked;
- 8 d. Touched female employees without their permission, including kissing,
- 9 hugging, touching their breasts and buttocks, and pressing his erect penis
- 10 against them;
- 11 e. Made sexually charged and unwelcome comments, including about his penis,
- 12 and about female employees' appearance, size, clothing, and bodies,
- 13 including their buttocks and breasts;
- 14 f. Requested female applicants and employees to go to his house for job
- 15 interviews or to pick up their wages, and then demanding sexual favors;
- 16 g. Directed female employees to give customers nude and sexually provocative
- 17 "shows" while working;
- 18 h. Requested that female employees give him "shows" while working;
- 19 i. Recorded female employees undressing and changing into their outfits for
- 20 work, showed those recordings to other employees, and commented about the
- 21 bodies of the employees in the videos; and
- 22 j. Requested dates and sexual acts, including in exchange for job security, better
- 23 shifts, or preferred work locations.

24 17. Tagle's sexual misconduct was unwelcome. Paradise Espresso employees who  
25 experienced it report feeling uncomfortable, stressed, afraid, or traumatized.

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1 18. Tagle's sexual misconduct harmed employees and former employees. Impacted  
2 persons suffered pecuniary and/or nonpecuniary injuries because of Tagle's sexual misconduct.  
3 Such injury constitutes willful and malicious injury for purposes of applicable law.

4 **B. Defendants Retaliated Against Employees Who Opposed Tagle's Sexual Harassment**

5 19. Defendants took adverse employment action against employees who rejected or  
6 opposed Tagle's unwelcome sexual conduct, including but not limited to, assigning fewer hours,  
7 assigning less favorable shifts, assigning less favorable work locations, termination, removing  
8 employees from Defendants' Instagram page that directed customers to where baristas were  
9 working which reduced their customer traffic, surveilling employees, and threatening  
10 employees. These actions would dissuade a reasonable person from engaging in protected  
11 activity.

12 20. Defendants' retaliation harmed employees and former employees. Impacted  
13 persons suffered pecuniary and/or nonpecuniary injuries because of Defendants' retaliation.  
14 Such injury constitutes willful and malicious injury for purposes of applicable law.

15 **C. Defendants Constructively Discharged Employees**

16 21. As a result of Tagle's intentional sexual misconduct and retaliation, the working  
17 conditions at Paradise Espresso coffee stands became intolerable for multiple female employees  
18 and forced several employees to quit their employment with Paradise Espresso.

19 22. Tagle's sexual misconduct was objectively and subjectively intolerable and  
20 unwelcome by Paradise Espresso employees.

21 23. Defendants' constructive discharge of employees harmed employees and former  
22 employees. Impacted persons suffered pecuniary and/or nonpecuniary injuries because of  
23 Defendants' constructive discharge of their employment. Such injury constitutes willful and  
24 malicious injury for purposes of applicable law.

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**D. Defendants Failed to Pay Employees the Minimum Wage for All Hours Worked and Failed to Pay All Tips**

24. Paradise Espresso employees were not promised a minimum number of hours or shifts in a given week. Instead, Tagle placed employees on the schedule at his discretion, making their hours unpredictable and their earnings sporadic.

25. Defendants did not maintain a regular pay schedule.

26. Paradise Espresso employees routinely were unpaid for work performed, including when onboarding for training as a new hire, and at the start or end of their shifts to clean, restock, and open and close the coffee stands.

27. Defendants did not regularly pay employees a minimum hourly wage. Instead, employees had to request their wages after not having been paid for several weeks or months. Defendants' payment of wages routinely failed to meet the minimum hourly wage required by state statute.

28. Defendants maintained sales quotas and required employees to surrender money from their tips to make up for any shortfall in the sales quotas.

29. Employees were required to take their credit card tips from the cash register at the end of their shift. Defendants failed to pay employees their tips when there was insufficient cash in the register to cover employees' credit card tips.

30. By failing to pay for all hours worked and failing to pay minimum wage, Defendants acted willfully and with the intent to deprive employees of their wages.

31. Defendants' failure to pay minimum wage for all hours worked and to pay all tips harmed employees and former employees. Impacted persons suffered pecuniary and/or nonpecuniary injuries because of Defendants' failure to pay them all their tips and the minimum wage required by law. Such injury constitutes willful and malicious injury for purposes of applicable law.

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1 **E. Defendants Deprived Employees of Paid Sick Leave in Violation of State Law**

2 32. Defendants failed to provide employees with paid sick leave. As a result,  
3 employees who were eligible to use sick leave either worked sick when they should have had  
4 the benefit of staying home, or stayed home without pay.

5 33. Defendants failed to notify employees of their entitlement to paid sick leave, the  
6 rate at which paid sick leave accrues, the authorized purposes under which sick leave may be  
7 used, and that retaliation for the employee's lawful use of paid sick leave is prohibited.

8 34. By failing to comply with State sick leave laws, Defendants acted willfully and  
9 with the intent to deprive employees of their statutorily required benefits.

10 35. Defendants' failure to provide paid sick leave and provide notice to employees of  
11 their entitlement to paid sick leave harmed employees and former employees. Impacted persons  
12 suffered pecuniary and/or nonpecuniary injuries because of Defendants' failure to provide  
13 statutorily required paid sick leave benefits. Such injury constitutes willful and malicious injury  
14 for purposes of applicable law.

15 **V. FIRST CAUSE OF ACTION**  
16 **(Violation of the WLAD—Sexual Harassment)**

17 36. The State realleges and incorporates by reference the allegations set forth in each  
18 of the preceding paragraphs of this Complaint.

19 37. Through their actions described above, Defendants discriminated against female  
20 workers in the terms or conditions of employment because of sex, in violation of  
21 RCW 49.60.030(1)(a) and RCW 49.60.180(3).

22 **VI. SECOND CAUSE OF ACTION**  
23 **(Violation of the WLAD—Retaliation)**

24 38. The State realleges and incorporates by reference the allegations set forth in each  
25 of the preceding paragraphs of this Complaint.

26 39. Through their actions described above, Defendants discriminated against

1 individuals who opposed unfair or discriminatory employment practices, in violation of  
2 RCW 49.60.210(1).

3 **VII. THIRD CAUSE OF ACTION**  
4 **(Violation of the WLAD—Constructive Discharge)**

5 40. The State realleges and incorporates by reference the allegations set forth in each  
6 of the preceding paragraphs of this Complaint.

7 41. Through their actions described above, Defendants constructively discharged  
8 female workers because of sex, in violation of RCW 49.60.030(1)(a) and RCW 49.60.180(2).

9 **VIII. FOURTH CAUSE OF ACTION**  
10 **(Violation of the MWA—Failure to Pay Wages, Including Tips)**

11 42. The State realleges and incorporates by reference the allegations set forth in each  
12 of the preceding paragraphs of this Complaint.

13 43. Through their actions described above, Defendants failed to pay employees for  
14 all hours worked, failed to pay such hours at or above the minimum wage rate, and failed to pay  
15 all tips, in violation of RCW 49.46.020(1), (2), and (3).

16 **IX. FIFTH CAUSE OF ACTION**  
17 **(Violation of MWA—Violation of Payment Interval Requirements)**

18 44. The State realleges and incorporates by reference the allegations set forth in  
19 each of the preceding paragraphs of this Complaint.

20 45. Through their actions described above, Defendants failed to pay all wages owed  
21 to employees on an established regular pay day at no longer than monthly intervals in violation  
22 of RCW 49.12.091, as implemented by Washington Administrative Code (WAC) 296-128-  
23 035(3).

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1                                   **X.     SIXTH CAUSE OF ACTION**  
2                                   **(Violation of the MWA—Failure to Provide Sick Leave)**

3           46.     The State realleges and incorporates by reference the allegations set forth in each  
4 of the preceding paragraphs of this Complaint.

5           47.     Through their actions described above, Defendants failed to provide paid sick  
6 leave in violation of RCW 49.46.020(4), 49.46.200, and 49.46.210.

7                                   **XI.    SEVENTH CAUSE OF ACTION**  
8                                   **(Violation of MWA—Failure to Comply With Paid Sick Leave**  
9                                   **Notification Requirements)**

10          48.     The State realleges and incorporates by reference the allegations set forth in each  
11 of the preceding paragraphs of this Complaint.

12          49.     Through their actions described above, Defendants failed to notify each employee  
13 of their entitlement to paid sick leave, the rate at which the employee will accrue paid sick leave,  
14 the authorized purposes under which sick leave may be used, and that retaliation for employees'  
15 lawful use of paid sick leave is prohibited in violation of RCW 49.12.091 and 49.46.810 as  
16 implemented by WAC 296-128-755.

17                                   **XII.   EIGHTH CAUSE OF ACTION**  
18                                   **(Violation of WRA—Willful and Intentional Failure to Pay Obligated Wages)**

19          50.     The State realleges and incorporates by reference the allegations set forth in each  
20 of the preceding paragraphs of this Complaint.

21          51.     Through their actions described above, Defendants willfully and with intent to  
22 deprive employees of any part of their wages, failed to pay obligated wages to employees for all  
23 hours worked, at rates established by any statute, ordinance, or contract, in violation of  
24 RCW 49.52.050.

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1                                   **XIII. NINTH CAUSE OF ACTION**  
2                                   **(Double Damages For Willful And Intentional Withholding Of Wages)**

3           52.     The State realleges and incorporates by reference the allegations set forth in each  
4 of the preceding paragraphs of this Complaint.

5           53.     Through their actions described above, Defendants acted willfully and with the  
6 intent to deprive employees of compensation to which they were entitled, and thus are liable for  
7 twice the amount of wages unlawfully withheld by way of exemplary damages pursuant to  
8 RCW 49.52.050 and RCW 49.52.070.

9                                   **XIV. PRAYER FOR RELIEF**

10          54.     Wherefore, the State of Washington prays that the Court:

- 11               a.    Declare, pursuant to RCW 7.24.010, that the discriminatory practices of  
12                      Defendants violate the WLAD;
- 13               b.    Declare, pursuant to RCW 7.24.010, that Defendants violated the minimum  
14                      wage and paid sick leave requirements of the MWA;
- 15               c.    Permanently enjoin, pursuant to RCW 7.40.010, Defendants from  
16                      discriminating on the basis of sex in any aspect of employment or retaliating  
17                      against employees who oppose and/or complain of discriminatory or unfair  
18                      employment practices;
- 19               d.    Permanently enjoin, pursuant to RCW 7.40.010, Defendants from failing to  
20                      pay the minimum wage or provide paid sick time as required by the MWA;
- 21               e.    Permanently enjoin, pursuant to RCW 7.40.010, Defendants from failing to  
22                      pay all wages owed to an employee on an established regular pay day at no  
23                      longer than monthly intervals;
- 24               f.    Order injunctive relief, pursuant to RCW 7.40.010, necessary to ensure  
25                      Jonathan Tagle is restrained from sexually harassing female applicants and  
26                      employees;

- 1 g. Order injunctive relief, pursuant to RCW 7.40.010, that requires Defendants  
2 to provide employees paid sick leave, comply with the notice requirements  
3 pursuant to WAC 296-128-755, and instate sick leave balances that should  
4 have accrued during the relevant period for current employees;
- 5 h. Order injunctive relief, pursuant to RCW 7.40.010, that requires Defendants  
6 to pay employees for all hours worked, pay such hours at or above the  
7 minimum wage rate, and pay all tips to employees;
- 8 i. Order injunctive relief, pursuant to RCW 7.40.010, that requires Defendants  
9 to pay employees for all hours worked on an established regular pay day at  
10 no longer than monthly payment intervals;
- 11 j. Award damages or other appropriate monetary relief to each person aggrieved  
12 by Defendants' discriminatory conduct, pursuant to RCW 49.60.030(2), in an  
13 amount to be proven at trial;
- 14 k. Award back pay to each person aggrieved by Defendants' failure to pay  
15 appropriate compensation for hours worked, pursuant to RCW 49.46.090(1),  
16 in an amount to be proven at trial;
- 17 l. Award exemplary damages equal to double the amounts due to aggrieved  
18 individuals;
- 19 m. Award pre-judgment and post-judgment interest;
- 20 n. Award the State the costs of suit including reasonable attorneys' fees; and
- 21 o. Award such additional relief as the interests of justice may require.
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1 DATED this 16th day of September 2025.

2 Respectfully Submitted,

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4 NICHOLAS W. BROWN  
Attorney General

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