

0300  
GEG ÁJÔVÁG ÁEFK HÁJT  
SÖ ÖÁUWÞVÝ  
ÚWÚÖUÜÁÁUWÜVÁÖŠÖÜS  
ÖEÖSÖÖ  
ÖÖJÖÁKÍ EGG ÌÌÌ EÁÞV

**STATE OF WASHINGTON  
KING COUNTY SUPERIOR COURT**

STATE OF WASHINGTON,

NO. 25-2-26877-2 KNT

Plaintiff,

**FIRST AMENDED 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 3. The State further brings this action to prevent Defendants from transferring or  
10 disposing their assets in violation of the Uniform Voidable Transactions Act (“UVTA”),  
11 RCW 19.40.041(1)(a) and to protect Plaintiff’s ability to recover a money judgment against  
12 Defendants.

## 13 II. JURISDICTION AND VENUE

14 4. The Attorney General is authorized to commence this action pursuant to  
15 RCW 43.10.030(1).

16 5. Subject matter jurisdiction is proper in this Court pursuant to RCW 2.08.010,  
17 RCW 7.24.010, and RCW 7.24.020 because this is an action alleging state law violations and  
18 seeking declaratory and injunctive relief.

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

## 22 III. THE PARTIES

23 7. Plaintiff is the State of Washington.

24 8. The Attorney General is the chief legal adviser to the State. RCW 43.10.030(1)  
25 authorizes the Attorney General to act in state court on matters of public concern. Defendants’  
26 sex discrimination and retaliation against female employees, and failure to pay wages and

1 benefits required by state law, are matters of public concern. RCW 49.60.010; RCW 49.46.005.  
2 Therefore, the Attorney General is authorized to commence this action.

3 9. Defendant Tagle Investments, LLC, dba Paradise Espresso, is a registered  
4 Washington corporation whose stated business is provision of food and beverages.

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

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

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

#### 13 IV. ALLEGATIONS

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

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

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

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

1 **A. Defendants Subjected Female Employees to Egregious Sexual Harassment**

2 17. From at least 2012 to at least November 2024, Defendants subjected female  
3 employees to unlawful discrimination on the basis of sex, including quid pro quo sexual  
4 harassment and/or severe or pervasive, unwelcome sexual conduct that gave rise to a hostile  
5 work environment. For instance, Tagle:

- 6 a. Required female employees to engage in sexual acts in order to be hired, keep  
7 their jobs, and/or be given better hours, shifts, or work locations;
- 8 b. Required female applicants to get naked in front of him during their job  
9 interviews;
- 10 c. Requested that female employees or applicants jump or bend over in front of  
11 him while naked;
- 12 d. Touched female employees without their permission, including kissing,  
13 hugging, touching their breasts and buttocks, and pressing his erect penis  
14 against them;
- 15 e. Made sexually charged and unwelcome comments, including about his penis,  
16 and about female employees' appearance, size, clothing, and bodies,  
17 including their buttocks and breasts;
- 18 f. Requested female applicants and employees to go to his house for job  
19 interviews or to pick up their wages, and then demanding sexual favors;
- 20 g. Directed female employees to give customers nude and sexually provocative  
21 "shows" while working;
- 22 h. Requested that female employees give him "shows" while working;
- 23 i. Recorded female employees undressing and changing into their outfits for  
24 work, showed those recordings to other employees, and commented about the  
25 bodies of the employees in the videos; and  
26

1 j. Requested dates and sexual acts, including in exchange for job security, better  
2 shifts, or preferred work locations.

3 18. Tagle's sexual misconduct was unwelcome. Paradise Espresso employees who  
4 experienced it report feeling uncomfortable, stressed, afraid, or traumatized.

5 19. Tagle's sexual misconduct harmed employees and former employees. Impacted  
6 persons suffered pecuniary and/or nonpecuniary injuries because of Tagle's sexual misconduct.  
7 Such injury constitutes willful and malicious injury for purposes of applicable law.

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

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

16 21. Defendants' retaliation harmed employees and former employees. Impacted  
17 persons suffered pecuniary and/or nonpecuniary injuries because of Defendants' retaliation.  
18 Such injury constitutes willful and malicious injury for purposes of applicable law.

19 **C. Defendants Constructively Discharged Employees**

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

23 23. Tagle's sexual misconduct was objectively and subjectively intolerable and  
24 unwelcome by Paradise Espresso employees.

25 24. Defendants' constructive discharge of employees harmed employees and former  
26 employees. Impacted persons suffered pecuniary and/or nonpecuniary injuries because of

1 Defendants' constructive discharge of their employment. Such injury constitutes willful and  
2 malicious injury for purposes of applicable law.

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

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

8 26. Defendants did not maintain a regular pay schedule.

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

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

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

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

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

23 32. Defendants' failure to pay minimum wage for all hours worked and to pay all tips  
24 harmed employees and former employees. Impacted persons suffered pecuniary and/or  
25 nonpecuniary injuries because of Defendants' failure to pay them all their tips and the minimum  
26

1 wage required by law. Such injury constitutes willful and malicious injury for purposes of  
2 applicable law.

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

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

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

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

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

17 **F. Defendants Acted to Sell Their Assets for “Cash” or “Cash Only” After Being Sued by**  
18 **Plaintiff**

19 37. Since at least September 24, 2025, just eight days after the State filed and served  
20 the complaint in this action, Defendants have been attempting to sell for “cash” or “cash only,”  
21 or sold for “cash” or “cash only,” “multiple,” but at least two, of their four Paradise Espresso  
22 coffee stands referenced in paragraph 13 above.

23 38. Defendants’ actions to sell their assets after being sued indicates an actual intent  
24 to hinder, delay, or defraud Plaintiff as a creditor. RCW 19.40.041(2)(d).

25 39. Cash is easily transferable, and Defendants’ insistence on “cash” or “cash only”  
26 transactions—if realized—would facilitate any effort by Defendants to secret, spend, transfer or

1 otherwise make the sale proceeds unavailable to pay a judgment, which would cause irreparable  
2 injury to Defendants’ current and former employees who already have been harmed by  
3 Defendants’ sexual harassment, unlawful discrimination, and wage theft.

4 40. Transfers made by Defendants with actual intent to hinder, delay, or defraud  
5 creditors, and after being sued on September 16, 2025, are voidable to the extent necessary to  
6 satisfy Plaintiff’s claims under applicable law. RCW 19.40.041(1).

7 41. Plaintiff is a “creditor” of Defendants by virtue of its WLAD and wage claims  
8 against Defendants alleged in this lawsuit. RCW 19.40.011(4).

9 42. Defendants are “debtors” by virtue of their statutory liability to Plaintiff under  
10 the WLAD and wage claims alleged in this lawsuit. RCW 19.40.011(6).

11 43. Plaintiff’s WLAD and wage claims against Defendants are “claims.”  
12 RCW 19.40.011(3).

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

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

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

20 **VI. SECOND CAUSE OF ACTION**  
21 **(Violation of the WLAD—Retaliation)**

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

24 47. Through their actions described above, Defendants discriminated against  
25 individuals who opposed unfair or discriminatory employment practices, in violation of  
26 RCW 49.60.210(1).



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

3                                   **XI. SEVENTH CAUSE OF ACTION**  
4                                   **(Violation of MWA—Failure to Comply With Paid Sick Leave**  
5                                   **Notification Requirements)**

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

8           57. Through their actions described above, Defendants failed to notify each employee  
9 of their entitlement to paid sick leave, the rate at which the employee will accrue paid sick leave,  
10 the authorized purposes under which sick leave may be used, and that retaliation for employees’  
11 lawful use of paid sick leave is prohibited in violation of RCW 49.12.091 and 49.46.810 as  
12 implemented by WAC 296–128–755.

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

15           58. The State realleges and incorporates by reference the allegations set forth in each  
16 of the preceding paragraphs of this Complaint.

17           59. Through their actions described above, Defendants willfully and with intent to  
18 deprive employees of any part of their wages, failed to pay obligated wages to employees for all  
19 hours worked, at rates established by any statute, ordinance, or contract, in violation of  
20 RCW 49.52.050.

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

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

25           61. Through their actions described above, Defendants acted willfully and with the  
26 intent to deprive employees of compensation to which they were entitled, and thus are liable for

1 twice the amount of wages unlawfully withheld by way of exemplary damages pursuant to  
2 RCW 49.52.050 and RCW 49.52.070.

3 **XIV. TENTH CAUSE OF ACTION**  
4 **(Violation of UVTA - Transfers Voidable As to Present and Future Creditors)**

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

7 63. Defendants acted to transfer assets for cash after being sued by Plaintiff, and they  
8 so acted with intent to hinder, delay, or defraud Plaintiff as a creditor.

9 64. Asset transfers made by Defendants after commencement of this lawsuit with  
10 actual intent to hinder, delay, or defraud the State, as creditor, are voidable pursuant to  
11 RCW 19.40.041(1)(a), (2)(d), to the extent necessary to satisfy Plaintiff's claims against  
12 Defendants.

13 **XV. PRAYER FOR RELIEF**

14 65. Wherefore, the State of Washington prays that the Court:

- 15 a. Declare, pursuant to RCW 7.24.010, that the discriminatory practices of  
16 Defendants violate the WLAD;
- 17 b. Declare, pursuant to RCW 7.24.010, that Defendants violated the minimum  
18 wage and paid sick leave requirements of the MWA;
- 19 c. Declare, pursuant to RCW 7.24.010, that Defendants' transfer of assets after  
20 commencement of this lawsuit violates the UVTA and are void to the extent  
21 necessary to satisfy Plaintiff's claims against Defendants;
- 22 d. Order equitable relief, pursuant to RCW 19.40.071, requiring that each  
23 Defendant provide a monthly accounting since September 16, 2025, of each  
24 of their assets and debts or liabilities (whether owned individually or  
25 together), including information regarding the valuation and location of each  
26 their assets and debts or liabilities, and identification of accounts, asset

1 co-owners, and creditors with respect to each of their assets and debts or  
2 liabilities, any transfers of such assets and debts made or obligated, and the  
3 amount of and location of cash in their possession, until such time and to the  
4 extent necessary to satisfy Plaintiff's claims against Defendants;

5 e. Order equitable relief, pursuant to RCW 19.40.071, enjoining Defendants  
6 from transferring or converting any assets (whether owned individually or  
7 together) until such time and to the extent necessary to satisfy Plaintiff's  
8 claims against Defendants;

9 f. Permanently enjoin, pursuant to RCW 7.40.010, Defendants from  
10 discriminating on the basis of sex in any aspect of employment or retaliating  
11 against employees who oppose and/or complain of discriminatory or unfair  
12 employment practices;

13 g. Permanently enjoin, pursuant to RCW 7.40.010, Defendants from failing to  
14 pay the minimum wage or provide paid sick time as required by the MWA;

15 h. Permanently enjoin, pursuant to RCW 7.40.010, Defendants from failing to  
16 pay all wages owed to an employee on an established regular pay day at no  
17 longer than monthly intervals;

18 i. Order injunctive relief, pursuant to RCW 7.40.010, necessary to ensure  
19 Jonathan Tagle is restrained from sexually harassing female applicants and  
20 employees;

21 j. Order injunctive relief, pursuant to RCW 7.40.010, that requires Defendants  
22 to provide employees paid sick leave, comply with the notice requirements  
23 pursuant to WAC 296-128-755, and instate and fund sick leave balances that  
24 should have accrued during the relevant period for current employees;

- 1 k. Order injunctive relief, pursuant to RCW 7.40.010, that requires Defendants  
2 to pay employees for all hours worked, pay such hours at or above the  
3 minimum wage rate, and pay all tips to employees;
- 4 l. Order injunctive relief, pursuant to RCW 7.40.010, that requires Defendants  
5 to pay employees for all hours worked on an established regular pay day at  
6 no longer than monthly payment intervals;
- 7 m. Award damages or other appropriate monetary relief to each person aggrieved  
8 by Defendants' discriminatory conduct, pursuant to RCW 49.60.030(2), in an  
9 amount to be proven at trial;
- 10 n. Award back pay to each person aggrieved by Defendants' failure to pay  
11 appropriate compensation for hours worked, pursuant to RCW 49.46.090(1),  
12 in an amount to be proven at trial;
- 13 o. Award exemplary damages under RCW 49.52.070 equal to double the  
14 amounts due to aggrieved individuals for wages owed;
- 15 p. Award pre-judgment and post-judgment interest;
- 16 q. Award the State the costs of suit including reasonable attorneys' fees; and
- 17 r. Award such additional relief as the interests of justice may require.

1 DATED this 24th day of October 2025.

2 Respectfully Submitted,

3  
4 NICHOLAS W. BROWN  
Attorney General

5 

6  
7 May Che, WSBA #62261  
8 Assistant Attorney General  
9 Wing Luke Civil Rights Division  
10 Office of the Attorney General  
11 800 Fifth Avenue, Suite 2000  
12 Seattle, WA 98104  
13 206-464-7744  
14 may.che@atg.wa.gov  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26