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June 16, 2026

VIA CERTIFIED U.S. MAIL & RETURN RECEIPT REQUESTED
[9589 0710 5270 3094 4233 56]

Department of Industrial Relations
California Labor & Workforce Development Agency
800 Capitol Mall, Suite 5000
Sacramento, CA 95814
[Notice Filed Online via LWDA/PAGA Filing Portal]

Tommy Bahama R&R Holdings, Inc.
c/o Amanda Garcia
330 N Brand Blvd,
Glendale, Ca 91203

Tommy Bahama R&R Holdings, Inc.
999 Peachtree Street, N.E., Ste. 688
Atlanta, GA 30309

Re: Candice Bell v. Tommy Bahama R&R Holdings, Inc.
PRIVATE ATTORNEY GENERAL ACT ("PAGA") NOTICE

Dear PAGA Administrator:

My firm has been retained by Candice Bell ("Ms. Bell") concerning her retaliation and wrongful termination action against Tommy Bahama R&R Holdings, Inc. ("Tommy Bahama"). I am writing this letter to the Labor & Workforce Development Agency ("LWDA") to exhaust her administrative remedies pursuant to *Labor Code* §§ 2699 *et seq.* and 2699.3.

Ms. Bell worked for Tommy Bahama from approximately June 17, 2025, to on or about October 10, 2025, as a bartender. Ms. Bell claims Tommy Bahama, as her employer, retaliated against and wrongfully terminated her in violation of California *Labor Code* §§ 232.5, 1102.5 & 6310, at least in part, due to Ms. Bell reporting to Tommy Bahama, and resisting, unlawful, violent and unsafe conduct in the workplace, including, but not limited to, unsafe working conditions that caused and/or put employees and/or customers at immediate risk of physical injury, assault, battery, sexual harassment and violations of relevant health and safety laws.

Specifically, Tommy Bahama terminated Ms. Bell in retaliation for complaining to Tommy Bahama about the inappropriate, harassing, unsafe and unlawful violent behavior of one of

Tommy Bahama's regular customers and Tommy Bahama's failure remedy and/or thwart such behavior from continuing. Namely, Ms. Bell had complained that one of Tommy Bahama's regular customers touched Ms. Bell inappropriately, without her consent, and made sexually charged remarks at her and others. Ms. Bell reported the same immediately to her Tommy Bahama's management. However, Tommy Bahama took no action to protect its Ms. Bell or its other employees from the same customer's sexual harassment. Instead, Tommy Bahama's management instructed Ms. Bell that she would be responsible herself for handling incidents of sexual harassment. In addition to the above, Ms. Bell repeatedly reported to Tommy Bahama's management manager that one of her fellow workers regularly left hazardous, broken glasses shards around the worksite, placing her and others at immediate risk of serious physical injury in the workplace. Instead of correcting the unsafe behaviors and unlawful conditions Ms. Bell complained about, on or about October 10, 2025, Tommy Bahama chose to wrongfully terminate Ms. Bell in retaliation for these complaints.

As a result of these circumstances, Ms. Bell is preparing to file a civil lawsuit with the San Diego Superior Court asserting civil claims including those for retaliation and wrongful termination as set forth by *Labor Code* §§ 232.5, 1102.5 & 6310, among other claims. The purpose of this letter is to learn whether the LWDA intends to investigate Ms. Bell's allegations regarding Tommy Bahama's violations of *Labor Code* §§ 232.5, 1102.5 & 6310, and the potential civil penalties specified by *Labor Code* §§ 1102.5(f), 1103, and 2699 *et seq.*

Submitted concurrently with this letter is the required filing fee of \$75.00, per the PAGA requirements. Thank you for your assistance and cooperation in this matter. Should you have any questions, please contact me at (213) 382-2222.

Sincerely,

/s/ Sebastian Morales

SEBASTIAN MORALES, ESQ.
EMPLOYEE JUSTICE LEGAL GROUP

**PROOF OF SERVICE
STATE OF CALIFORNIA,
COUNTY OF LOS ANGELES**

I reside in the county of Los Angeles, State of California, I am over the age of eighteen and not a party to the within action; my business address 1001 Wilshire Blvd., 2nd Floor, Los Angeles, California 90017. On the date shown below, I served the foregoing document, described as:

1. Private Attorney General Act Notice.

On the intended parties by placing the true copies thereof in a sealed envelope addressed to:

Department of Industrial Relations
California Labor & Workforce Development Agency
800 Capitol Mall, Suite 5000
Sacramento, CA 95814
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I am "readily familiar" with the firm's practices of collection and processing correspondence for mailing. Under that practice it would be deposited with the U. S. Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on the motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of the deposit for mailing an affidavit of service thereof.

Executed on June 16, 2026, in Los Angeles, California.

I declare under the penalty of perjury under the laws of the state of California that the foregoing is true and correct.

Name: Sebastian Morales

Signature: /s/ Sebastian Morales