

**IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
CASE NO.:**

NICOLE TALL,

Plaintiff,

v.

REDCON1, LLC,

Defendant.

COMPLAINT

Plaintiff, NICOLE TALL (“TALL,” or, “Plaintiff”), by and through her undersigned attorney, hereby files her Complaint and sues Defendant, REDCON1, LLC (“REDCON” or “Defendant”) as follows:

JURISDICTION, PARTIES, AND VENUE

1. This is an action for damages for violation(s) of the Florida Whistleblower Act (“FWA”), Fla. Stat. § 448.102, for Defendant’s retaliatory discharge of Plaintiff.
2. The amount in dispute exceeds the sum of \$50,000.00, exclusive of interest, costs, and attorney’s fees.
3. Plaintiff is a resident of Miami County, Florida; over the age of eighteen years; and otherwise *sui juris*.
4. Defendant is a limited liability company with its principal address located in Boca Raton, Florida, and has been conducting substantial business within Florida and is subject to the laws herein.

5. Venue is proper in this court pursuant to Florida Statutes § 448.103 in that the retaliatory personnel actions occurred in Palm Beach County, Florida.

GENERAL ALLEGATIONS

6. REDCON is a sports supplement brand that markets and sells its product nationwide.
7. Plaintiff worked for REDCON as VP of Finance from March 10, 2025, until her termination on July 11, 2025.
8. During Plaintiff's employment with Defendant, REDCON advertised to consumers that it would donate 5 cents to a military charity for every energy can bought.
9. Specifically, REDCON's energy drink has the phrase "Every can supports the military" printed on its body.
10. The energy drink also has a QR code that, when scanned, would direct the consumer to REDCON's community voting page, where REDCON lets consumers vote for which military charity it would donate to at the end of every quarter.
11. However, despite REDCON's advertisement promise, Plaintiff, as VP of Finance, never saw any disbursement or donation to any military charity during her tenure.
12. Plaintiff reasonably believed that REDCON's practice of false and misleading advertisement constituted fraud, and/or violation of FDUTPA, and/or violation of Fla. Stat. 817.41(1).
13. When Plaintiff reached out to REDCON's CEO, Aaron Singerman, on or about July 8, 2025, to inquire about the issue and object to REDCON's unscrupulous practice, she never received any response.
14. Plaintiff was terminated three (3) days later on July 11, 2025.

15. Prior to Plaintiff's termination, she never received any reprimand and was praised for her performance.
16. Plaintiff was terminated without any legitimate, non-retaliatory reason.
17. Plaintiff has retained the undersigned firm to represent her in her claims and has agreed to pay them their reasonable attorneys' fees and costs.
18. Plaintiff is therefore entitled to her reasonable attorneys' fees if she is the prevailing party, pursuant to Fla. Stat. § 448.104.

COUNT ONE:
VIOLATION OF THE FLORIDA WHISTLEBLOWER ACT

19. Plaintiff re-alleges and re-avers the allegations contained in paragraphs 1–18 as fully set forth herein.
20. This is an action for damages under the Private Whistleblower Protection Act, pursuant to Florida Statutes §448.101 and §448.102, in taking retaliatory personnel action against Plaintiff for objecting to and/or refusing to participate in the violation of a law, rule, and regulations.
21. Plaintiff objected to the violations she discovered with the CEO of REDCON.
22. At the time Plaintiff made her objection, she had a reasonable belief that the issues were violations of state and/or federal law.
23. As a result of Plaintiff's objection, she was terminated without legitimate cause or reason on July 11, 2025.
24. At all relevant times, Plaintiff's work performance had been satisfactory, and Defendant did not have a legitimate, non-retaliatory reason for terminating her.
25. By reason of Defendant's actions, Plaintiff has been damaged in that Plaintiff has suffered lost wages, benefits, and has suffered emotional distress.

WHEREFORE, Plaintiff NICOLE TALL requests judgment as follows:

- a. Compensation to Plaintiff for lost wages, benefits, and other remuneration associated with the loss of her job;
- b. Compensatory damages;
- c. Reasonable attorney's fees and costs for this action pursuant to Fla. Stat. § 448.104; and
- d. Such other relief as the court deems proper.

DEMAND FOR JURY TRIAL

Plaintiff, NICOLE TALL, hereby demands trial by jury on all counts so triable contained herein.

Dated: November 19, 2025.

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