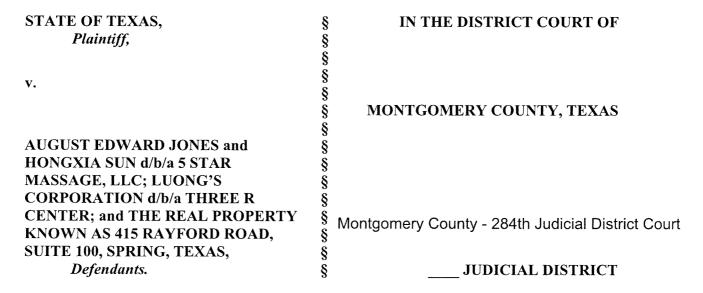
CAUSE NO. 23-03-04612



PLAINTIFF'S ORIGINAL PETITION AND APPLICATION FOR EX PARTE TEMPORARY RESTRAINING ORDER, TEMPORARY INJUNCTION, AND PERMANENT INJUNCTION

Plaintiff, STATE OF TEXAS, acting by and through the Attorney General of Texas, Ken Paxton, files this petition complaining of Defendants AUGUST EDWARD JONES and HONGXIA SUN d/b/a 5 STAR MASSAGE, LLC ("5 Star Massage"); LUONG'S CORPORATION d/b/a THREE R CENTER ("Luong's Corp."); and THE REAL PROPERTY KNOWN AS 415 RAYFORD ROAD, SUITE 100, SPRING, TEXAS ("The Real Property") and seeks temporary and permanent injunctive relief to stop the operation of an illicit massage establishment in order to protect the public as follows:

I. DISCOVERY CONTROL PLAN

- 1. The State intends to conduct discovery under Level 2 of Texas Rules of Civil Procedure 190.3 and affirmatively plead that this case is not governed by the expedited actions process in Texas Rule of Civil Procedure 169 for the following reasons:
 - (a) The relief sought includes non-monetary injunctive relief.

(b) The claims for monetary relief—including penalties, costs, expenses, consumer

redress, and attorney fees— are in excess of \$100,000.

II. JURISDICTION AND STATUTORY AUTHORITY

2. This enforcement action is brought by Attorney General Ken Paxton, through his

Consumer Protection Division, in the name of the STATE OF TEXAS and in the public interest

pursuant to the authority granted by § 17.47 of the Texas Deceptive Trade Practices—Consumer

Protection Act (DTPA), Tex. Bus. & Com. Code §§ 17.41–17.63, upon the ground that Defendants

5 STAR MASSAGE; LUONG'S CORP.; and THE REAL PROPERTY have engaged in false,

deceptive, and misleading acts and practices in the course of trade and commerce as defined in,

and declared unlawful by, § 17.46(a) and (b) of the DTPA. In enforcement suits filed pursuant to

DTPA § 17.47, the Attorney General is authorized to seek civil penalties, redress for consumers,

and injunctive relief.

3. In addition, the Attorney General brings this suit against 5 Star Massage pursuant to the

authority granted by Texas Occupations Code § 455.351, upon the ground that 5 Star Massage is

in violation of Chapter 455 of Texas Occupations Code by owning/operating an establishment that

offers massage therapy or other massage services regulated by Chapter 455 and was not licensed

under that chapter when they began providing massage services. In enforcement suits filed

pursuant to Texas Occupations Code § 455.351, the Attorney General may seek civil penalties and

injunctive relief.

4. Finally, the Attorney General brings this suit against all Defendants to enjoin and abate a

common nuisance pursuant to Texas Civil Practice & Remedies Code §§ 125.001–125.047.

Verification of the petition or proof of personal injury need not be shown by the State. Tex. Civ.

Prac. & Rem. Code § 125.002(a).

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III. PUBLIC INTEREST AND NOTICE

5. The State believes that Defendants have engaged in, and will continue to engage in, the

unlawful practices set forth in this petition.

6. The State has reason to believe Defendants have caused and will cause immediate,

irreparable injury, loss, and damage to the State of Texas by owning, operating, maintaining, or

advertising an illicit massage establishment that fails to comply with applicable licensing and other

requirements of state and local law intended to protect the health and safety of its citizens. See

Tex. Civ. Prac. & Rem. Code § 125.002; Tex. Occ. Code § 455.351. Therefore, these proceedings

are in the public interest. See Tex. Bus. & Comm. Code § 17.47(a).

7. The State has reason to believe Defendants maintain an illicit massage establishment where

persons habitually go for massage therapy or other massage services in violation of Texas

Occupations Code Chapter 455, which constitutes a common nuisance as defined by Texas Civil

Practice and Remedies Code § 125.0015(a)(18). Therefore, Defendants' conduct is subject to

abatement under Texas Civil Practice and Remedies Code § 125.002.

8. Pre-suit notice is not required under DTPA § 17.47(a) because, in the opinion of the

Consumer Protection Division, there is good cause to believe that Defendants would evade service

of process if prior contact were made, Defendants would destroy relevant records if prior contact

were made, and/or that such an emergency exists that immediate and irreparable injury, loss, or

damage would occur as a result of such delay in obtaining a temporary restraining order, including

danger to public health and the likelihood that Defendants would attempt to evade service or

secrete assets.

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IV. VENUE

- 9. Venue of this suit lies in Montgomery County, Texas, under the DTPA § 17.47(b), for the following reasons:
 - (a) The transactions forming the basis of this suit occurred in Montgomery County,

 Texas.
 - (b) Defendants have done business in Montgomery County, Texas.
 - (c) Defendants' principal places of business are in Montgomery County, Texas.
- 10. In addition, venue is mandatory in Montgomery County under CPRC § 125.002 because the nuisance to be enjoined is maintained by Defendants in Montgomery County, Texas.

V. TRADE AND COMMERCE

11. At all times described below, Defendants and their agents have engaged in conduct constituting "trade" and "commerce," defined in § 17.45(6) of the DTPA, as follows:

"Trade" and "commerce" mean the advertising, offering for sale, sale, lease, or distribution of any good or service, of any property, tangible or intangible, real, personal, or mixed, and any other article, commodity, or thing of value, wherever situated, and shall include any trade or commerce directly or indirectly affecting the people of this state.

VI. CLAIM FOR RELIEF

12. Plaintiff seeks monetary relief—including penalties, costs, expenses, consumer redress, and attorney fees—in excess of \$100,000 and could exceed \$1,000,000. Plaintiff also seeks nonmonetary, injunctive relief.

VII. DEFENDANTS

13. Defendants August Edward Jones and Hongxia Sun d/b/a 5 Star Massage, LLC ("5 Star Massage") are the tenants of The Real Property where they own and operate 5 Star Massage,

LLC ("5 Star Massage"), a Texas Limited Liability Company, with an assumed name certificate filed in Montgomery County, Texas, an illicit massage business. 5 Star Massage is currently a defendant in this case. Defendants August Edward Jones and Hongxia Sun are a married couple residing in Montgomery County, Texas. Defendants are the owners of 5 Star Massage located at 415 Rayford Road, Suite 100, Spring, Texas. Defendants may be served at their place of residence 425 Rayford Road, Apt. 1111, Spring, Texas 77386, or wherever they may be found.

- 14. **Defendant Luong's Corporation d/b/a Three R Center ("Luong's Corp.")** is a Texas corporation which regularly conducts business in Montgomery County, Texas. Luong's Corp. owns and maintains The Real Property in question located at 415 Rayford Road, Suite 100, Spring, Texas. Luong's Corp. leases The Real Property to August Edward Jones and Hongxia Sun d/b/a 5 Star Massage, LLC. Luong's Corp.'s principal place of business is located at 15055 Woodforest Blvd., Channelview, Texas 77530, where they may be reached. Defendant may be served with process by serving its registered agent, Investor Support Services, LLC, at 5855 Sovereign Drive, Suite D151, Houston, Texas, 77036.
- 15. **Defendant The Real Property Known As 415 Rayford Road, Suite 100, Spring, Texas** ("The Real Property") is owned by Defendant Luong's Corp. and is sued *in rem*. Defendant The Real Property contains a strip mall with suites leased to various businesses, including 5 Star Massage in Suite 100. At all times relevant to this suit, The Real Property is owned by Luong's Corp. Luong's Corp.'s principal place of business is located at 15055 Woodforest Blvd., Channelview, Texas 77530, where they may be reached. Defendant may be served with process by serving its registered agent, Investor Support Services, LLC, at 5855 Sovereign Drive, Suite D151, Houston, Texas, 77036.
- 16. For purposes of this petition, the following definitions apply:

- "5 Star Massage" means August Edward Jones and Sun Hongxia d/b/a 5 Star (a) Massage, LLC
- "Luong's Corp." means Luong's Corporation d/b/a Three R Center (b)
- "The Real Property" means The Real Property known as 415 Rayford Rd., Ste. (c) 100, Spring, Texas, owned by Defendant Luong's Corp.
- "Defendants" means all defendants named in this petition. (d)

VIII. ACTS OF AGENTS

- 17. Whenever in this petition it is alleged that Defendants did any act, it is meant that:
 - the named defendant or defendants performed or participated in the act, or (a)
 - (b) the named defendant's or defendants' officers, successors in interest, agents, partners, trustees or employees performed or participated in the act on behalf of and under the authority of one or more of the Defendants.

IX. FACTUAL BACKGROUND

A. A Brief Overview of Illicit Massage Businesses.

18. An estimated 9,000 illicit massage businesses currently operate throughout the country, with 300 estimated to operate in the Houston area. These businesses generate an average revenue of over \$100 million per year, much of it laundered to countries outside of the United States.²

 $^{^{1}}$ Polaris, Human Trafficking in Illicit Massage Businesses 10 (2018), available at https://polarisproject.org/wp-content/uploads/2019/09/Human-Trafficking-in-Illicit-Massage-Businesses.pdf; Samantha Lopez, How Illicit Massage Businesses are Shut Down in Houston, HOUSTON CHRONICLE (July 1, 2019), https://www.chron.com/houston/article/How-illicit-massage-businesses-are-shut-down-in-14059133.php (last visited December 12, 2022).

² POLARIS, pg. 4.

19. Illicit massage businesses sell commercial sex under the guise of legitimate massage therapy services.³ Many of the women employed at illicit massage businesses are victims of human trafficking.⁴ Several of these victims are trafficked from China, South Korea, Thailand, and Vietnam.⁵ Recruiters often direct victims to job leads within their communities through fake advertisements promising high wages for work as a legal massage therapist and providing housing, transportation, and assistance with immigration and licensing.⁶ Women take out loans to pay for these services, often between \$5,000 and \$40,000.⁷ Upon arrival in the United States, they find that the promised jobs do not exist, and traffickers force them to work at these illicit massage establishments to pay off their debt.⁸ However, instead of earning money to pay down debt or to send home to family, the victims' debt continues to accrue, with wages withheld for room and board, fees for breaking "rules," future bail money, and potential attorneys' fees.⁹ Traffickers may also hold victims' identification and immigration documents at separate locations, using the threat of deportation as additional leverage, and monitor them on closed-circuit television (CCTV) cameras inside the establishment to "creat[e] the feeling that they are always watched." ¹⁰

³ *Id.* at 50.

⁴ *Id.* at 19–26.

⁵ *Id*. at 17.

⁶ *Id*.

⁷ *Id*. at 19.

⁸ *Id*.

⁹ *Id.* at 29–30. In one case in Waco, Texas, victims interviewed as part of a raid reported receiving only 20 percent of their earnings, having their first week's pay withheld as a "deposit," and paying room and board to sleep in the back of the business. *Id.* at 12.

¹⁰ *Id.* at 30, 33.

20. Illicit massage businesses are often part of larger organized crime networks. ¹¹ Traffickers use intricate networks of legitimate and illegitimate businesses and shell corporations to launder money, obscure their identities, and avoid law enforcement. ¹² Often, victims themselves appear as the owner or manager of the business, which can make it difficult for law enforcement to distinguish between victims and perpetrators. ¹³ Traffickers also cycle victims between illicit massage businesses and across state lines, sometimes as often as every two to six weeks, further fostering dependence on traffickers. ¹⁴ The victims of trafficking end up disoriented, indebted, and afraid that any cooperation with law enforcement could result in deportation, prosecution, or retaliatory violence. ¹⁵

B. The Texas Legislature's Response to Human Trafficking.

21. In 2017, the Texas Legislature passed House Bill 2552, aimed at combatting human trafficking, sexual offenses, and other activity that may constitute a public nuisance. Among other amendments, H.B. 2552 added § 17.46(b)(33) to the DTPA laundry list, making it a false, misleading, or deceptive act to own, operate, maintain, or advertise a massage establishment that violates Chapter 455 of the Texas Occupations Code. Tex. H.B. 2552, 85th Leg., R.S. (2017), § 1 (codified at DTPA § 17.46(b)(33)). To own, operate, or advertise massage therapy, a massage

¹¹ *Id.* at 35–38.

¹² *Id.* at 36; Lise Olse, *Illicit Massage Parlors Prolific and Lucrative, Study Finds*, HOUSTON CHRONICLE (October 11, 2017), https://www.chron.com/news/houston-texas/houston/article/Illicit-massage-parlors-prolific-and-lucrative-12256818.php (last accessed Dec. 23, 2019).

¹³ Olse, *supra* note 12.

¹⁴ POLARIS at 25.

¹⁵ Rachel Axon, Cara Kelly, & Michael Braun, Sex Trafficking is Behind the Lucrative Illicit Massage Business. Why Police Can't Stop It, USA TODAY (July 30, 2019) https://www.usatoday.com/indepth/news/investigations/2019/07/29/sex-trafficking-illicit-massage-parlors-cases-fail/1206517001/ (last visited January 13, 2023).

¹⁶ Tex. H.B. 2552, 85th Leg., R.S. (2017).

establishment must comply Texas Occupations Code Chapter 455, among other requirements, by

obtaining a massage establishment license, employing licensed massage therapists, and

maintaining client records. ¹⁷ Under DTPA § 17.46(b)(33), it is a false, misleading or deceptive act

to own, operate, maintain or advertise an unlicensed massage establishment, one that does not

employ licensed therapists, and/or one that does not maintain records or meet other criteria

required by Chapter 455.¹⁸

22. In conjunction with amending the DTPA, H.B. 2552 also amended several provisions of

the common nuisance statute (Chapter 125 of the Civil Practices and Remedies Code) pertaining

to unlicensed massage therapy establishments. Under the nuisance statute, any "person who

maintains a place to which persons habitually go for [massage therapy or other massage services

in violation of Chapter 455, Occupations Code] . . . and who knowingly tolerates the activity and

furthermore fails to make reasonable attempts to abate the activity maintains a common

nuisance."19 The Legislature expanded the types of evidence to be considered as prima facie

evidence of common nuisance under CRPC § 125.004 for cases of massage therapy or other

massage services in violation of Chapter 455. Tex. H.B. 2552, 85th Leg., R.S. (2017), § 8 (codified

at Tex. Civ. Prac. & Rem. Code § 125.004(a-1)–(a-3), (d), (e)).

23. In amending these two statutes concurrently, along with several others, the Texas

Legislature made clear its intent to hold all parties involved in illicit massage businesses

accountable. As the statement of intent for H.B. 2552 explains:

H.B. 2552 strengthens Texas' response to the ongoing problems of human and sex trafficking by building upon current nuisance and abatement law. This helps local

governments shut down illicit massage [businesses]. The bill also . . . provides a

¹⁷ Tex. Occ. Code §§ 455.151–455.207 (relating to licensing requirements under Chapter 455).

¹⁸ DTPA § 17.46(b)(33)(A).

¹⁹ Tex. Civ. Prac. & Rem. Code § 125.0015(a)(18).

means for property owners to evict businesses that are engaging in human trafficking. 20

C. Chapter 455 of the Texas Occupations Code.

24. As previously stated, illicit massage businesses purport to operate as legitimate ones and

advertise as offering legitimate massage therapy services. In Texas, the offering of massage

therapy services is governed by Chapter 455 of the Texas Occupations Code.²¹

25. Under Chapter 455, a "massage establishment" is "a place of business that advertises or

offers massage therapy or other massage services[,] includ[ing] a place of business that

advertises or offers any service described by a derivation of the terms 'massage therapy' or 'other

massage services." "Massage therapy" is defined as "the manipulation of soft tissue by hand or

through a mechanical or electrical apparatus for the purpose of body massage and including

effleurage (stroking), petrissage (kneading), tapotement (percussion), compression, vibration,

friction, nerve strokes, and Swedish gymnastics."23 "Other massage services" are "any services

offered or performed for compensation at a massage establishment that involve physical contact

with a client, and may include the use of oil, lubricant, salt glow, a heat lamp, a hot and cold pack,

or a tub, shower, jacuzzi, sauna, steam, or cabinet bath."²⁴ A "massage therapist" means "a person

who practices or administers massage therapy or other massage services to a client for

compensation."25

²⁰ Sen. Res. Ctr., Bill Analysis, Tex. H.B. 2552, 85th Leg., R.S. (2017).

²¹ Tex. Occ. Code § 455.0511(b)(1).

²² Tex. Occ. Code § 455.001(5).

²³ Tex. Occ. Code § 455.001(8).

²⁴ Tex. Occ. Code § 455.001(11).

²⁵ Tex. Occ. Code § 455.001(7).

26. Chapter 455 states that "[a] massage establishment may employ only licensed massage

therapists to perform massage therapy or other massage services."²⁶ Several requirements

concerning practices are directly aimed at combating illicit massage businesses' practices: a

massage establishment's employees must be able to work legally in the United States, they may

not engage in sexual contact in the establishment, and they may not reside on the premises of the

establishment.²⁷ Further, a massage establishment "shall properly maintain and secure for each

client the initial consultation documents, all session notes, and related billing records" to be

provided to the Texas Department of Licensing and Regulation (TDLR) upon request. ²⁸ A massage

establishment also "may not change the location of the establishment without obtaining a new

massage establishment license."29

27. Under Chapter 455, "sexual contact includes (A) any touching of any part of the genitalia

or anus; (B) any touching of the breasts of a female without the written consent of the female; (C)

any offer or agreement to engage in any activity described in Paragraph (A) or (B); (D) kissing

without the consent of both persons; (E) deviate sexual intercourse, sexual contact, sexual

intercourse, indecent exposure, sexual assault, prostitution, solicitation of prostitution, and

promotion of prostitution as described in Chapters 21, 22, and 43, Penal Code, or any offer or

agreement to engage in such activities; (F) any behavior, gesture, or expression that may

reasonably be interpreted as inappropriately seductive or sexual; or (G) inappropriate sexual

comments about or to a client, including sexual comments about a person's body."30

²⁶ Tex. Occ. Code § 455.202(a).

²⁷ Tex. Occ. Code § 455.202(b)(1)–(6).

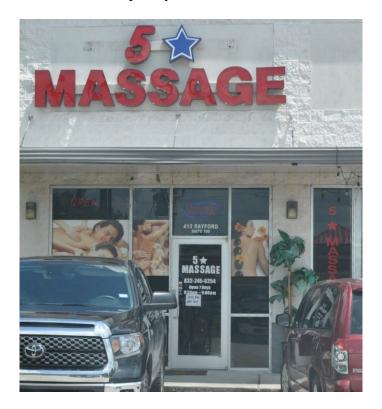
²⁸ Tex. Occ. Code § 455.202(c)(1),(2).

²⁹ Tex. Occ. Code § 455.206.

³⁰ Tex. Occ. Code § 455.202(d)(2).

D. Illicit Massage Activity at 415 Rayford Road, Suite 100.

28. 5 Star Massage is and was an illicit massage business located at 415 Rayford Road, Suite 100, Spring, Texas.³¹ The Montgomery County Sheriff's Department ("MCSD") has issued citations to employees of 5 Star Massage related to performing massage therapy without a valid license.³² 5 Star Massage advertises its massage services via a sign hung on the shopping center building façade and on the joint-tenant sign located at the edge of the parking lot near the feeder road.³³ The windows and door are completely covered.³⁴



³¹ Ex. 2, Montgomery County Sheriff's Office Deputy Report for Incident 21A240256

³² Id. at 20. ("Lin was cited for [performing] massage without a license.")

³³ Ex. 3, Photo of Business, DSC 045.NEF

³⁴ *Id*.

29. Inside the front door of 5 Star Massage is a small lobby with a front desk, a couch and an

interior metal door barring further entry beyond the lobby.³⁵ Behind the metal interior door, the

illicit massage business has a long hallway with private massage rooms on each side.³⁶ Several

cameras monitor the lobby and exterior of the building.³⁷ The private rooms contain a bed/massage

table in the center of the room, a chair near the door, and a small cabinet in the far corner of the

room.38

30. 5 Star Massage also advertises online using websites like www.rubratings.com,

Adultsearch, and Bedpage.com.³⁹ These advertisements appear to be for illicit massage services.⁴⁰

For example, advertisements have explicit photos of women and made statements such as: "NUNU

B2B MASSAGE" (Nude Body to Body), "FULL BODY RUB AND MORE FUN," "Shower

TOGETHER," and "Touch & Lick & Blow." These advertisements state "5 Star Massage"

and/or "5 Start Massage," list the address of 415 Rayford Road, Suite 100, Spring, TX 77036 and

the phone number of 832-245-6254.⁴²

³⁵ Ex. 2 at 10, 15.

³⁶ *Id.* at 15.

³⁷ *Id.* at 10.

³⁸ *Id.* at 15.

³⁹ *Id.* at 4.

⁴⁰ *Id*.

⁴¹ Ex. 4, Adultsearch Feb. 26, 2022 advertisement; Ex. 5, Bedpage March 2, 2022 advertisement; Ex. 6, Rubratings

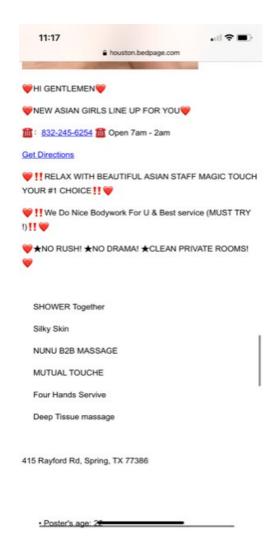
Sept. 1, 2021 advertisement; Ex. 7, Rubratings Aug. 13, 2021 advertisement, Ex. 8, Bedpage Oct. 21, 2022

advertisement

⁴² Ex. 2 at 4.

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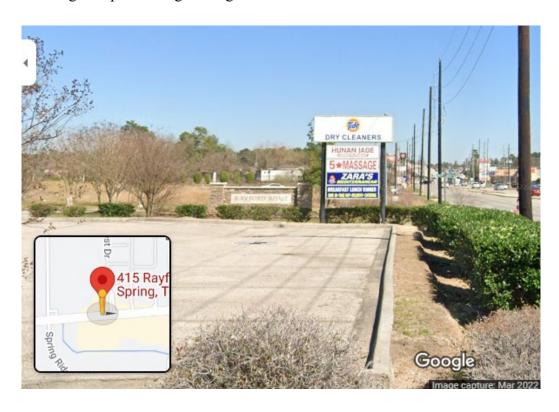


31. As owner of 415 Rayford Road, Suite 100, Defendant Luong's Corp. has profited as landlord/lessor to 5 Star Massage. ⁴³ Upon reason and belief, Danny Luong and Muoi Luong, as agents or affiliates of Defendant Luong's Corp., have permitted August Edward Jones and Hongxia Sun d/b/a 5 Star Massage, LLC to rent its storefront. ⁴⁴ Also, upon reason and belief, Defendant Luong's Corp., has profited from August Edward Jones and Hongxia Sun d/b/a 5 Star Massage

⁴³ *Id*.

⁴⁴ *Id*.

renting its storefront.⁴⁵ Defendant Luong's Corp. has owned The Real Property since 2007.⁴⁶ Defendant Luong's Corp. has advertised the illicit massage business at this location using its multitenant sign and building-mounted signs.⁴⁷ Defendant Luong's Corp. has maintained the premises, despite notice of illicit activity occurring on the premises, including citations issued to employees of 5 Star Massage for performing massage services without a license.⁴⁸



32. In September 2021, Texas Attorney General Ken Paxton and the Montgomery County Sheriff's Office sent Defendant Luong's Corp. a Notice by Law Enforcement, pursuant to Tex.

⁴⁵ *Id*.

⁴⁶ Ex. 9, Montgomery Central Appraisal District Property Detail for 415 Rayford Road, Spring, Texas 77386

⁴⁷ Ex. 10, Street View Google Maps. March 2022

⁴⁸ Ex. 2 at 20.

Civ. Prac. and Rem. Code 125.0017. 49 This letter served as notice that a law enforcement agency

has and had reason to believe that activity described by Civ. Prac. And Rem. Code 125.0015(a)(6),

(7), and (18) has occurred at 5 Star Massage and that such activities are common indicators of

human trafficking. ⁵⁰ Subsequently, in November 2021, Defendant Luong's Corp. as Landlord, sent

August Edward Jones, Tenant, for the premises known as 415 Rayford Road, Suite 100, a Notice

to Vacate demanding eviction to ensure the cessation of illegal activity on the property.

E. Montgomery County Sheriff's Office Investigation and Surveillance of 5 Star Massage

33. In July 2021, the Montgomery County Sheriff's Office Organized Crime Unit began

investigating 5 Star Massage after discovering several advertisements for the business on

RubRatings.com, a website where individuals can view illicit massage businesses in their area.⁵¹

The advertisements included the business address, 415 Rayford Road, Suite 100, and the phone

number of 832-245-6254.⁵² These advertisements depict images of women with their breasts

partially covered either with their hands or clothing.⁵³

34. In August 2021, the Montgomery County Sheriff's Office Organized Crime Unit began

surveillance of 5 Star Massage.⁵⁴ On August 2, 2021, an undercover detective entered 5 Star

Massage to ask about pricing and saw two females at the front of the business. 55 One of the females

⁴⁹ Ex. 11, Notice Letter from Texas Office of the Attorney General to Luong Muoi and Luong's Corp. dated Sept. 2, 2021

⁵⁰ *Id*.

⁵¹ Ex. 2 at 4.

⁵² *Id*.

⁵³ *Id*.

⁵⁴ *Id*. at 6.

⁵⁵ *Id*.

was wearing a red bustier top with a black lace bra. ⁵⁶ Another detective did not enter the business

but conducted surveillance of the location and witnessed two males either enter or leave the

business.⁵⁷

35. Surveillance of 5 Star Massage continued August 3, 2021, March 7, 2022, and March 9,

2022.⁵⁸ During surveillance of 5 Star Massage, the detective observed predominately female

employees and only male customers entering the business premises and leaving after twenty to

thirty minutes.⁵⁹ At certain times during the surveillance, 5 Star Massage's front door appeared

locked, with customers allowed inside only after knocking on the door. 60

F. Undercover Buy Walk Operation

On March 10, 2022, the Montgomery County Sheriff's Office Organized Crime Unit 36.

initiated an undercover operation, "a prostitution buy walk operation," of 5 Star Massage. 61 Upon

entering the business and inquiring about a massage, the undercover detective was escorted to a

massage room but was not asked to fill out new patient information forms or provided an initial

consult. 62 After entering the massage room, the woman that escorted the undercover detective to

the massage room, who stated her name was ""Lisa"" (an alias), remained present while the

⁵⁶ *Id*

⁵⁷ *Id*.

⁵⁸ *Id.* at 7 - 19.

⁵⁹ *Id.* at 7 - 19.

 60 *Id.* at 18 - 19.

⁶¹ *Id.* at 15.

undercover detective completely disrobed. 63 "Lisa" then exited the room after the undercover

detective paid for a thirty-minute massage.⁶⁴

37. After a short period of time, "Lisa" reentered the massage room and began administering

a massage; "Lisa" climbed up onto the massage table, pulled up her dress, and sat on the

undercover detective's legs.⁶⁵ While sitting on the table, "Lisa" made sexual contact with the

detective. 66 When the detective attempted to move, "Lisa" stated that it was "OK," and the

detective was not able to break contact until "Lisa" moved positions. 67 After massaging the

detective's back, arms, and neck, "Lisa" asked the detective to turn over, but before the detective

could do so, "Lisa" made sexual contact with the detective's genitalia. ⁶⁸

38. "Lisa" began rubbing the detective's chest and then crawled onto the massage table and

made sexual contact with the detective's genitalia and offered sexual services. ⁶⁹ Throughout the

remainder of the visit, "Lisa" offered sexual services, exposed herself, and made sexual contact

with the detective's genitalia several more times. ⁷⁰ As she was escorting the detective to the exit,

"Lisa" stated that the business was open until 2:00 a.m. and that she is always at that location. 71

⁶³ *Id.* at 15 – 16.

⁶⁴ *Id*.

⁶⁵ *Id.* at 15.

66

⁶⁷ *Id*.

⁶⁸ *Id.* at 16.

⁶⁹ *Id*.

 70 *Id.* at 16 - 17.

⁷¹ *Id.* at 17.

As the detective was leaving, "Lisa" hugged him, made sexual contact with the detective's

genitalia, and stated, "more money." 72

39. After the undercover detective left the location, another detective entered 5 Star Massage

for an inspection. 73 During the inspection, "Lisa" was properly identified based on identifying

documents located in luggage found inside 5 Star Massage.⁷⁴ Another detective searched the

wooded area next to 5 Star Massage.⁷⁵ There, the detective found two women standing in the

woods who claimed they did not work at 5 Star Massage. 76 The undercover detective was able to

identify that at least one of the women was inside 5 Star Massage during the undercover

operation.⁷⁷ The women were escorted to 5 Star Massage, and were properly identified based on

identifying documents located in luggage found inside 5 Star Massage. 78 Two of the women had

expired visitor visas and one of the women was here on a current visitor visa. ⁷⁹ None of the women

were licensed massage therapists. 80 "Lisa" was cited for performing massages without a proper

massage therapist license.81

G. Defendants Have Violated the Texas Occupations Code, Engaged in False, Misleading,

and Deceptive Trade Practices, and Maintain a Common Nuisance.

⁷² *Id*

⁷³ *Id*. at 20.

⁷⁴ *Id*.

⁷⁵ *Id.* at 21.

⁷⁶ *Id*.

⁷⁷ *Id*.

⁷⁸ *Id*.

⁷⁹ *Id*.

⁸⁰ *Id*.

81 *Id*. at 20.

- 40. Defendant 5 Star Massage is in violation of Chapter 455 of the Texas Occupations Code by employing unlicensed massage therapists, employing persons who are not United States citizens or legal permanent residents with valid work permits, allowing individuals to engage in sexual contact in 5 Star Massage, allowing individuals to practice massage therapy in the nude or in clothing designed to arouse or gratify the sexual desire of an individual in 5 Star Massage, allowing individuals to reside on the premises of 5 Star Massage, and by failing to maintain client records. Tex. Occ. Code § 455.202(a), (b)(1), (b)(3)–(6), (c)(1).
- 41. Defendants 5 Star Massage and Luong's Corp., as well as their agents, have, in the conduct of trade and commerce in the State of Texas, engaged in false, misleading, and deceptive acts and practices declared unlawful under the DTPA by owning, operating, maintaining, and advertising an illicit massage business. *See* DTPA § 17.46(a). As outlined above, Defendants 5 Star Massage and Luong's Corp. own, operate, maintain, and/or advertise a massage establishment that is not in compliance with the requirements of Chapter 455 or applicable local ordinances. *See* DTPA § 17.46(b)(33)(A)–(B).
- 42. Finally, Defendants Luong's Corp. and The Real Property maintain a common nuisance by maintaining a place to which persons habitually go for the purpose of illicit massage therapy or other illicit massage services in violation of Chapter 455 of the Texas Occupations Code, knowingly tolerated the activity, and failed to make reasonable attempts to abate the activity. Tex. Civ. Prac. & Rem. Code § 125.0015(a)(6), (18). As outlined above, The Real Property is frequently used for the purpose of illicit massage therapy or other illicit massage services in violation of Chapter 455 of the Texas Occupations Code, which is prima facie evidence that Defendants Luong's Corp. and The Real Property knowingly tolerated that activity. Tex. Civ. Prac. & Rem. Code § 125.004(a).

X. VIOLATIONS OF THE TEXAS OCCUPATIONS CODE

- 43. The State incorporates and adopts by reference the allegations contained in each and every preceding paragraph of this petition.
- 44. Under the Texas Occupations Code, Chapter 455, a person may not act as, or represent that the person is, "a massage therapist . . . or massage establishment unless the person holds an appropriate license issued under this chapter." Tex. Occ. Code § 455.151(a), (b).
- 45. Defendant 5 Star Massage, as alleged and detailed above, has violated Texas Occupations Code § 455.151(a) and (b) by acting and representing itself as a massage establishment without holding the appropriate license. *See* Tex. Occ. Code § 455.151(a), (b).
- 46. In addition, Defendant 5 Star Massage has engaged in the following conduct prohibited by the Texas Occupations Code:
 - (a) Employing an unlicensed massage therapist to perform massage therapy or other massage services (Tex. Occ. Code § 455.202(a));
 - (b) Employing an individual who is not a United States citizen or a legal permanent resident with a valid work permit (Tex. Occ. Code § 455.202(b)(1));
 - (c) Allowing any individual, including a client, student, license holder, or employee, to engage in sexual contact in the massage establishment (Tex. Occ. Code § 455.202(b)(4));
 - (d) Allowing any individual, including a student, license holder, or employee, to practice massage therapy in the nude or in clothing designed to arouse or gratify the sexual desire of any individual (Tex. Occ. Code § 455.202(b)(5));
 - (e) Allowing any individual, including a student, license holder, or employee, to reside on the premises of the massage establishment (Tex. Occ. Code § 455.202(b)(6));
 - (f) Failing to properly maintain and secure for each client the initial consultation documents, all session notes, and related billing records (Tex. Occ. Code § 455.202(c)(1)); and
 - (g) Failing to post in plain sight the license for each massage therapist who practices in the massage establishment (Tex. Occ. Code § 455.204(b)).

47. Under Chapter 455, the Attorney General may institute an action for civil penalties and

injunctive relief against a person who "appears to be in violation of or threatening to violate this

chapter or a rule adopted under this chapter; or is the owner or operator of an establishment that

offers massage therapy or other massage services regulated by this chapter and is not licensed

under this chapter." Tex. Occ. Code § 455.351(a). The amount of a civil penalty for a violation of

Chapter 455 "shall be not less than 1,000 or more than \$10,000 for each violation" and "[e]ach

day a violation occurs or continues to occur is a separate violation." *Id.* at § 455.351(b), (c).

XI. VIOLATIONS OF THE TEXAS BUSINESS & COMMERCE CODE

48. The State incorporates and adopts by reference the allegations contained in each and every

preceding paragraph of this petition.

49. Defendants 5 Star Massage and Luong's Corp., as alleged and detailed above, have in the

conduct of trade and commerce, engaged in false, misleading, or deceptive acts or practices in

violation of § 17.46(a) of the Texas Business and Commerce Code.

50. The State has reason to believe that Defendants 5 Star Massage and Luong's Corp., in the

course and conduct of trade and commerce, have directly or indirectly engaged in false,

misleading, and deceptive acts and practices declared to be unlawful by the DTPA by owning,

operating, maintaining, or advertising a massage establishment, as defined by Section 455.001,

Occupations Code, that:

(A) is not appropriately licensed under Chapter 455, Occupations Code, or is not in

compliance with the applicable licensing and other requirements of that chapter; or

(B) is not in compliance with an applicable local ordinance relating to the licensing or

regulation of massage establishments.

DTPA § 17.46(b)(33).

- 51. In addition, the State has reason to believe in the course and conduct of trade and commerce, Defendants 5 Star Massage and Luong's Corp., have directly or indirectly engaged in false, misleading, and deceptive acts and practices declared to be unlawful by the DTPA by:
 - (a) causing confusion or misunderstanding as to the source, sponsorship, approval, or certification of goods or services (§ 17.46(b)(2));
 - (b) causing confusion or misunderstanding as to affiliation, connection, or association with, or certification by, another (§ 17.46(b)(3));
 - (c) representing that goods or services have sponsorship, approval, characteristics, or benefits which they do not have or that a person has a sponsorship, approval, status, affiliation, or connection which the person does not (§ 17.46(b)(5));
 - (d) representing that the goods or services are of a particular standard, quality, or grade, if they are of another (§ 17.46(b)(7));
 - (e) representing that an agreement confers or involves rights, remedies, or obligations which it does not have or involve, or which are prohibited by law (§ 17.46(b)(12)); and
 - (f) failing to disclose information concerning goods or services which was known at the time of the transaction if such failure to disclose such information was intended to induce the consumer into a transaction into which the consumer would not have entered had the information been disclosed (§ 17.46(b)(24)).
- 52. Whenever the Consumer Protection Division has reason to believe that a person is engaging in, has engaged in, or is about to engage in any act or practice declared unlawful by the DTPA, and that proceedings would be in the public interest, the Consumer Protection Division may bring an action against the person to restrain by temporary restraining order, temporary injunction, or permanent injunction, the use of such method, act, or practice. DTPA § 17.47(a). Cessation of unlawful conduct shall not render such court action moot under any circumstances. *Id*.
- 53. Under the DTPA, in addition to a temporary restraining order, temporary injunction, or permanent injunction, the Consumer Protection Division may request, and the trier of fact may award, a civil penalty to be paid to the State in an amount of not more than \$10,000 per violation. DTPA § 17.47(c).

XII. VIOLATIONS OF THE CIVIL PRACTICE & REMEDIES CODE: COMMON NUISANCE

- 54. The State incorporates and adopts by reference the allegations contained in each and every preceding paragraph of this petition.
- 55. Chapter 125 of the Texas Civil Practice & Remedies Code defines a common nuisance. Section 125.0015(a) states "[a] person who maintains a place to which persons habitually go for [certain] purposes and who knowingly tolerates the activity and furthermore fails to make reasonable attempts to abate the activity maintains a common nuisance." The purposes that give rise to a common nuisance include: "massage therapy or other massage services in violation of Chapter 455, [Texas] Occupations Code." Tex. Civ. Prac. & Rem. Code § 125.0015(a)(6), (18).
- 56. 5 Star Massage, located at 415 Rayford Road, Suite 100, Spring, Texas, constitutes a common nuisance under Texas Civil Practice and Remedies Code § 125.0015(a)(18) because persons habitually go to this location for illicit massage therapy or other illicit massage services in violation of Chapter 455 of the Texas Occupations Code.
- Defendants Luong's Corp. and The Real Property own, operate, or maintain the location and knowingly tolerate the nuisance activity, and further, fail to make reasonable attempts to abate the nuisance activity. Tex. Civ. Prac. & Rem. Code §§ 125.002(b), 125.0015(a)(18). This action is brought by the State to request injunctive relief to abate this nuisance and enjoin Defendants from maintaining or participating in the nuisance and for any other reasonable requirements to prevent the use of The Real Property as a common nuisance. Tex. Civ. Prac. & Rem. Code § 125.002(e). Plaintiff requests that upon issuance of injunctive relief, each of the Defendants be ordered to post a bond in the name of the State to be forfeited to the State in the event of a violation by Defendants of the injunction. Tex. Civ. Prac. & Rem. Code § 125.003(a). The bond must be payable to the State of Texas, be in the amount set by the Court, but no less than \$5,000 nor more

than \$10,000, have sufficient sureties approved by the Court, and be conditioned that the

Defendants will not knowingly allow a common nuisance to exist at 415 Rayford Road, Suite 100,

Spring, Texas. Tex. Civ. Prac. & Rem. Code § 125.045(a-1).

58. Based upon § 125.002(e) of the Texas Civil Practice & Remedies Code, if the instrument

is in favor of the Plaintiff, the Court shall grant an injunction ordering Defendants to abate the

nuisance and be enjoined from maintaining or participating in the common nuisance. The Court

may include in the order reasonable requirements to prevent the use or maintenance of the place

as a nuisance. Under § 125.002(e) of the Texas Civil Practice & Remedies Code, the instrument

must order that the location where the nuisance was found is closed for one year after the date of

the instrument.

59. Pursuant to § 125.003(a) of the Texas Civil Practice & Remedies Code, should any

condition of the bond or any injunctive order by this Court be violated, the Plaintiff may sue upon

the bond, and upon showing a violation of any condition of the bond or injunctive order, the whole

sum of the bond should be ordered forfeited to the Plaintiff and the location where the nuisance

was found should be closed for one year. In addition, in accordance with § 125.002(d) of the Texas

Civil Practice and Remedies Code, a person who violates a temporary or permanent injunctive

order is subject to the following sentences for civil contempt: a) a fine of not less than \$1,000 or

more than \$10,000; b) confinement in jail for a term of not less than ten (10) days or more than

thirty (30) days; or c) both a fine and confinement. If a Defendant violates the temporary or

permanent injunction, under § 125.045(b), the Court may make additional orders to abate the

nuisance.

60. On violation of the bond or injunction, the place where the nuisance exists shall be ordered

closed for one year from the date of the order of bond forfeiture. *Id.*

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XIII. DISGORGEMENT/CONSTRUCTIVE TRUST/UNJUST ENRICHMENT

61. The State incorporates and adopts by reference the allegations contained in each and every

preceding paragraph of this petition.

62. The State requests the Court impose a constructive trust over the assets and funds

Defendants derived from providing illegal massage therapy or other illegal massage services.

Defendants would be unjustly enriched if allowed to retain the proceeds and assets from their

criminal activities in providing illegal massage services. Defendants' assets are subject to the

equitable remedy of disgorgement, which is the forced relinquishment of all benefits that would

be unjust for Defendants to retain, including all ill-gotten gains and benefits or profits that have

resulted from Defendants' advertising and sale of illegal massage services. Plaintiff prays that

Defendants be ordered to disgorge all monies taken from consumers as a result of Defendants'

deceptive practices, together with all the proceeds, profits, income, interest, and assets acquired

with the proceeds of Defendants' deceptive practices. Plaintiff further prays that the Court enjoin

Defendants from transferring, moving, concealing, spending, or withdrawing funds derived from

providing illegal massage therapy or other illegal massage services to the public.

XIV. APPLICATION FOR EX PARTE TEMPORARY RESTRAINING ORDER, TEMPORARY INJUNCTION, AND PERMANENT INJUNCTION

63. Plaintiff, the State of Texas, has reason to believe that the Defendants are engaging in, have

engaged in, or are about to engage in acts and practices declared to be unlawful under the DTPA

and believes these proceedings to be in the public interest. Therefore, pursuant to DTPA

§ 17.47(a), Plaintiff, the State of Texas, requests relief by way of a Temporary Restraining Order,

Temporary Injunction, and Permanent Injunction as set forth in the Prayer. Cessation of unlawful

conduct shall not render such court action moot under any circumstances. Id

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64. Further, pursuant to Chapter 125 of the Texas Civil Practice & Remedies Code, Plaintiff,

the State of Texas, requests the Court enjoin Defendants 5 Star Massage, Luong's Corp., and The

Real Property from maintaining or participating in the common nuisance described herein, i.e.,

massage therapy or other massage services in violation of Chapter 455 of the Texas Occupations

Code at the illicit massage business located at 415 Rayford Road, Suite 100, Spring, Texas, and

order such requirements as to prevent the ongoing nuisance activity in Montgomery County,

Texas. Tex. Civ. Prac. & Rem. Code § 125.002(b), (e). Under § 125.002(a) of the Texas Civil

Practice and Remedies Code, Plaintiff is not required to verify facts in support of the requested

injunctive relief to abate the nuisance activity or to prove personal injury.

65. The State additionally requests injunctive relief to restrain a violation of Texas Occupations

Code, Chapter 455 by Defendant 5 Star Massage because they (a) appear to be in violation of or

threatening to violate this chapter or a rule adopted under this chapter; or (b) are the owner or

operator of an establishment that offers massage therapy or other massage services regulated by

Chapter 455 and are not licensed under this Chapter 455. Tex. Occ. Code § 455.351(a).

66. Plaintiff believes immediate injunctive relief by way of Temporary Restraining Order and

Temporary Injunction is necessary to prevent continuing harm prior to trial.

67. The State further asks the Court to find that Plaintiff is likely to succeed on the merits on

its claim for common nuisance and included in the Court's temporary injunction order (i)

reasonable requirements to prevent the use or maintenance of 5 Star Massage as a nuisance, and

(ii) require that Defendants each execute a bond of not less than \$5,000 nor more than \$10,000,

payable to the State, with sufficient sureties and conditioned that Defendants will not maintain a

common nuisance. Tex. Civ. Prac. & Rem. Code § 125.045(a).

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68. The Court shall issue such injunctive relief without requiring a bond from the Plaintiff. DTPA § 17.47(b); Tex. Civ. Prac. & Rem. Code § 6.001(a).

XV. REQUEST TO CONDUCT DISCOVERY PRIOR TO TEMPORARY INJUNCTION HEARING

69. The State requests leave of this Court to conduct depositions of witnesses and parties prior to any scheduled Temporary Injunction Hearing and prior to Defendants' answer date. There are a number of witnesses who may need to be deposed prior to any scheduled injunction hearing. Any depositions, telephonic or otherwise, would be conducted with reasonable, shortened notice to Defendants and their attorneys. The State also requests that the filing requirements for business records and the associated custodial affidavits be waived for purposes of all temporary injunction hearings. In addition, the State requests that the Court order Defendants to produce any agreements between the Defendants or their agents, including but not limited to lease agreements and maintenance agreements, within 5 days of receiving the courts order.

XVI. CONDITIONS PRECEDENT

70. All conditions precedent to the State's claim for relief have been performed or have occurred.

XVII. TRIAL BY JURY

71. The State demands a jury trial and tenders the appropriate fee with this petition.

XVIII. PRAYER

- 72. The State respectfully requests that this Court issue citations for Defendants to appear and answer.
- 73. Plaintiff prays that the TEMPORARY RESTRAINING ORDER be issued, and that after due notice and hearing, a TEMPORARY INJUNCTION be issued, and upon final hearing, a

PERMANENT INJUNCTION be issued, restraining and enjoining Defendants, Defendants'

officers, agents, servants, employees, attorneys—and any other person in active concert or

participation with any or all Defendants—from engaging in the following acts or practices without

further order of the Court:

(a) Deleting any data or communications relating to owning, operating, maintaining or

advertising a massage establishment, or the provision of massage therapy or other massage

services on any phones or electronic devices used by any Defendants;

(b) Transferring, concealing, destroying, or removing from the jurisdiction of this

Court any books, records, documents, invoices or other written materials—including

electronic documents—relating to owning, operating, maintaining, or advertising a

massage establishment, or the provision of massage therapy or other massage services, that

are currently or hereafter in any of the Defendants' possession, custody or control except

in response to further orders or subpoenas in this cause;

(c) Transferring, spending, hypothecating, concealing, encumbering or removing from

the jurisdiction of this Court any money, stocks, bonds, assets, notes, equipment, funds,

accounts receivable, policies of insurance, trust agreements, or other property, real,

personal or mixed, wherever situated, belonging to or owned by, in possession of, or

claimed by any of the Defendants, insofar as such property relates to, arises out of or is

derived from the business operations of Defendants except in response to further orders by

the Court;

(d) Owning, operating, maintaining, or advertising a massage establishment that fails

to comply with the licensing or other requirements of Texas Occupations Code, Chapter

455;

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(e) Causing confusion or misunderstanding as to the source, sponsorship, approval, or

certification of services by owning, operating, maintaining, or advertising an unlicensed

massage establishment or having persons on the premises who provide massage services

without a license;

(f) Representing that massage services have sponsorship, approval, characteristics, or

benefits which they do not have by owning, operating, maintaining, or advertising an

unlicensed massage establishment or that a person has a sponsorship, approval, status,

affiliation, or connection which the person does not, specifically, a license under Texas

Occupations Code, Chapter 455;

(g) Representing that an agreement confers or involves rights, remedies, or obligations

which it does not have or involve, or which are prohibited by law including, but not limited

to, allowing any individual, including a client, student, license holder, or employee, to

engage in sexual contact in the massage establishment;

(h) Failing to publicly and appropriately display, within sight of the main entrance of

the establishment, the license of the establishment and the license of any individual on the

premises who provides massage therapy or other massage services;

(i) Denying any agent of the Texas Department of Licensing and Regulation, the Texas

Attorney General's Office, a peace officer, or any other agent of the State access to any

massage establishment owned, operated or maintained by Defendants;

Interfering with an inspection of a massage establishment, including denying access

to the location, by any agent of the Texas Department of Licensing and Regulation, the

Texas Attorney General's Office, Montgomery County Sherriff's Office, a peace officer,

or any other agent of the State, including the failure to maintain and make available to the

(i)

inspector the initial consultation documents, session notes, and related billing records for

each client;

(k) Failing to preserve video surveillance of the Defendants' store premises and to

maintain and operate video surveillance of the premises and provide copies of the video

surveillance to Plaintiff's counsel upon request;

(1) Employing an individual who is not a United States citizen or a legal permanent

resident with a valid work permit at a massage establishment;

Allowing a nude or partially nude employee to provide massage therapy or other (m)

massage services;

(n) Allowing any individual, including a client, student, license holder, or employee,

to engage in sexual contact in the massage establishment;

(o) Allowing any individual, including a student, license holder, or employee, to

practice massage therapy in the nude, or in clothing designed to arouse or gratify the sexual

desire of any individual, including wearing lingerie; and

Allowing any individual, including a student, license holder, contractor, or (p)

employee, to reside on the premises of the massage establishment.

74. Further still, the State prays that the Court ORDER, for purposes of effectuating and

enforcing Court orders in this lawsuit and ensuring no individuals are owning, operating,

maintaining, or advertising a massage establishment as defined by Section 455.001 of the Texas

Occupations Code, that is not appropriately licensed under Chapter 455 of the Texas Occupations

Code, or is not in compliance with the applicable licensing and other requirements of that chapter,

that the constable from the appropriate precinct do the following:

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- (a) Instruct any persons in the premises at 415 Rayford Road, Suite 100, Spring, Texas, including the tenant and all persons claiming under said tenant, including employees, and contractors, to leave the premises immediately; and
- (b) Post the Temporary Restraining Order on the door of 415 Rayford Road, Suite 100,Spring, Texas.
- 75. In addition, the State prays that the Court grant the following monetary relief:
 - (a) Order Defendants to pay civil penalties to the State of Texas of not less than \$1,000 or more than \$10,000 for each day of violation of Chapter 455 of the Texas Occupations Code, pursuant to Texas Occupations Code § 455.351(b) and (c);
 - (b) Order Defendants to pay civil penalties to the State of Texas of not more than \$10,000 for each violation of the DTPA, and for each violation calculated to deprive money or property from a consumer who was 65 years of age or older; an <u>additional</u> amount of not more than \$250,000, pursuant to DTPA § 17.47(c) and (g);
 - (c) Order Defendants to restore all money or other property obtained from consumers by means of unlawful acts or practices or, in the alternative, order disgorgement of all sums, monies, and value taken from consumers by means of deceptive trade practices, together with all proceeds, interest, income, profits, and accessions thereto; making such disgorgement for the benefit of victimized consumers and the State of Texas, pursuant to DTPA § 17.47(d);
 - (d) Order Defendants to pay attorneys' fees, court costs, witness fees, deposition fees and investigative costs, as appropriate, under Texas Government Code § 402.006(c), Texas Occupations Code § 455.351(e), and Texas Civil Practice and Remedies Code § 125.003(b);

- (e) Pre-judgment and post-judgment interest;
- (f) Place an equitable lien and constructive trust on all of Defendants' assets, personal property, and real property, and grant the State an interest in said assets and property; and
- (g) Order Defendants' assets be repatriated into the jurisdiction of the Court.
- 76. Plaintiff further prays that this Court grant all other relief to which the Plaintiff, the State of Texas, is entitled.

Respectfully submitted,

KEN PAXTON Attorney General of Texas

BRENT WEBSTER First Assistant Attorney General

GRANT DORFMAN
Deputy First Assistant Attorney General

SHAWN E. COWLES
Deputy Attorney General for Civil Litigation

STEVEN ROBINSON
Division Chief, Consumer Protection Division

/s/ Kaylie Buettner KAYLIE BUETTNER Assistant Attorney General State Bar No. 24109082 Kaylie.Buettner@oag.texas.gov RICK BERLIN Assistant Attorney General State Bar No. 24055161 Rick.Berlin@oag.texas.gov DANIEL ZWART **Assistant Attorney General** State Bar No. 24070906 Daniel.Zwart@oag.texas.gov Consumer Protection Division 808 Travis, Suite 1520 Houston, Texas 77002

Telephone 713-223-5886 Facsimile 713-223-5821

ATTORNEYS FOR PLAINTIFF, STATE OF TEXAS

VERIFICATION

The foregoing petition is supported and verified by the following affidavit and exhibits, which are incorporated by reference:

Exhibit 1: Affidavit of Charlene Gale (and Exhibits 2 – 17 referenced therein)

AFFIDAVIT OF CHARLENE GALE

Before me, the undersigned notary, on this day personally appeared Charlene Gale, the affiant, a person whose identity is known to me. After I administered an oath to affiant, affiant testified:

- 1. "My name is Charlene Gale. I am over 18 years of age, of sound mind, and capable of making this affidavit. The facts stated in this affidavit are within my personal knowledge and are true and correct.
- 2. I am an Investigator at the Office of the Attorney General of Texas, Consumer Protection Division. I have been employed by the Attorney General's Office since 2005. My regular duties include assisting the Division attorneys with investigations of potential defendants.
- 3. As part of my regular duties, I reviewed documented relating to 5 Star Massage from the Montgomery County Sheriff's Office.
- 4. Exhibit 13 is a true and correct copy of the certified Assumed Name Certificate for 5 Star Massage from the Montgomery County Sheriff's Office.
 - a. The certificate was filed with the Montgomery County Clerk in June 2021 and shows 5 Star Massage's address as 415 Rayford Road, Suite 100, Spring, Texas.
 - b. The certificate shows August Jones is the owner of the business.
- 5. Exhibit 14 is a true and correct copy of certified Secretary of Sate of filings for 5 Stars Massage, LLC. After reviewing these filings, I noted the following:
 - a. 5 Stars Massage filed a Certificate of Formation for a Limited Liability Company in August 2021.
 - b. Hongxia Sun was listed as the registered agent and manager.
 - c. The address is listed as 415 Rayford Road, #100. Spring, Texas.
 - d. 5 Stars Massage filed a change of registered office in August 2022.
 - e. The registered office was changed to 24939 Bastiani Canvas Ln., Katy, Texas.
 - f. The change of registered office was filed by Hongxia Sun.
- 6. Exhibit 10 is a true and correct image of the street view of 415 Rayford Road in Montgomery County from www.google.com/maps.
 - a. This Google image capture is from March 2022.

- b. This street view shows the multitenant sign of 415 Rayford Road, which includes a sign for 5 Star Massage.
- 7. Exhibit 3 is a true and correct copy of a photo that the Montgomery County Sheriff's Office took of the front of 5 Star Massage.
 - a. The business hours are listed on the door as "OPEN 7 DAYS" from "9:30 am 9:00 pm."
 - b. The business phone number is listed on the door as "832-245-6254."
- 8. Exhibit 15 is a true and correct copy of the massage license information for 5 Star Massage from the Texas Department of Licensing and Regulation.
 - a. The address is listed as 415 Rayford Road, Suite 100, Spring, Texas.
 - b. The license number is ME6502.
 - c. The license became effective in August 2021.
 - d. The phone number is listed as 281-780-4280.
- 9. Exhibit 9 is a true and correct copy of the Montgomery County Appraisal District's data for 415 Rayford Road, Spring, Texas, from https://esearch.mcad-tx.org/Property-Detail/PropertyQuickRefID/R319397/PartyQuickRefID/O0076907.
 - e. The property is classified as a 'Retail Store.'
 - f. In 2007, Luong's Corp. bought this property from DMA Rayford Ridge Retail Center LP.
 - g. Luong's Corp. is listed as the current owner of the property.
- 10. Exhibit 16 is a true and correct copy of certified Secretary of State filings for Luong's Corporation. After reviewing these filings, I noted the following:
 - a. Luong's Corporation was incorporated in August 1998, and Reiko Cho was listed as its incorporator.
 - b. Muoi Luong and Danny Luong were listed as directors of Luong's Corporation.
 - c. Luong's Corporation filed a certificate of amendment in June 2007 amending the registered agent to Investor Support Services, LLC and adding Jessie Luong as a director and removing Danny Luong as director.
 - d. The June 2007 amendment added Investor Support Services, LLC as the registered agent with the registered office at 5855 Sovereign Drive, Suite D151, Houston, Texas.

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- e. Luong's Corporation filed a certificate of amendment in April 2010 removing Jessie Luong as director.
- f. Luong's Corporation filed an assumed name certificate in December 2021 for Three R Center by Danny Luong as vice president.
- g. The entity's principal office is listed as 15055 Woodforest Blvd., Channelview, Texas.
- 11. Exhibit 2 is a true and correct copy of a redacted report compilation from the Montgomery County Sheriff's Office ("MCSO") reflecting its investigation of 5 Star Massage. This report compilation describes the MCSO's investigation of the online advertisements of 5 Star Massage. This report compilation describes the activities and results of the MCSO's undercover investigation of 5 Star Massage:
 - a. In July 2021, a MCSO detective discovered several illicit advertisements for 5 Star Massage on www.Rubratings.com.
 - b. In August 2021 and March 2022, MCSO detectives conducted surveillance of 415 Rayford Road several times.
 - c. In August 2021, a MCSO undercover detective entered the business and inquired about the pricing for a massage.
 - d. In March 2022, a MCSO undercover detective conducted an undercover buy at the business. During the undercover buy, the detective was not asked to fill out new-client paperwork. The deputy received a massage by an unlicensed masseuse. During the massage, the unlicensed masseuse made sexual contact with the detective's genitals multiple times and offered other sexual acts for an additional cost.
- 12. Exhibit 17 is a true and correct copy of an online ad the MCSO viewed in July 2021 and August 2021.
 - a. The photos in the ad show scantily clad women.
 - b. The ad lists the business phone number as 832-245-6254 and the address as "415 Rayfor Rd Suite 100, Spring Tx."
 - c. The advertisement is for "Body Rubs" and includes, "I am exactly what you have been looking for, a sexy and beautiful Asian girl, I provide an amazing skillful experience that will relax you."
- 13. Exhibit 4 is a true and correct copy of a redacted online ad provided by the MCSO.
 - a. The photos in the ad show partially nude photos of women and scantily clad women.
 - b. The ad lists the business phone number as 832-245-6524 and the address as 415 Rayford Road Spring TX.

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- c. The ad states that the business is open from 7 AM 2 AM.
- d. The advertisement is for "MUTUAL TOUCHE" and to "SHOWER Together."
- 14. Exhibit 5 is a true and correct copy of an online ad provided by the MCSO.
 - a. The ad shows scantily clad women.
 - b. The business phone number is listed as 832-245-6524 and the business address as 415 Rayford Rd, Spring, TX.
 - c. The business hours are listed as 7am 12am.
 - d. The advertisement states "guaranteed to leave you happy" with various emoticons, including that of a tongue.
 - e. The advertisement lists that the poster's age is "22."
- 15. Exhibit 6 is a true and correct copy of a redacted online ad provided by the MCSO.
 - a. The ad shows scantily clad women.
 - b. The business address is listed as "415 Rayfor Rd Suite 100, Spring, Tx" and the phone number is 832-245-6524.
 - c. The advertisement is for "full service," "soft body and finger," "body to body + Hot Nuru massage," and "Hot bikini show perfect body finger."
- 16. Exhibit 7 is a true and correct copy of a redacted online ad provided by the MCSO.
 - a. The ad shows scantily clad women.
 - b. The business address is "415 Rayfor Rd Suite 100, Spring Tx" and the phone number is listed as "281-780-4280."
 - c. The business hours are listed as 9:30am 9:30pm.
 - d. The advertisement is for "Pretty and sexy Asian Girls, Silky soft skin," "We have curves that will make u say WOW!" and "100% Playful & Open Minded."
- 17. Exhibit 8 is a true and correct copy of a web capture I took of an online ad.
 - a. The ad lists the business phone number as 832-245-6254 and the business address as 415 Rayford Rd, Spring, TX.
 - b. The business hours are listed as 7 am 2 am.
 - c. The advertisement includes services to "SHOWER Together" and "Four Hands Servicele."

Affidavit of Charlene Gale Page 4 of 6

- 18. Exhibit 11 is a true and correct copy of a letter sent to Luong Muoi and Luong's Corporation from the Human Trafficking Transnational Organized Crime Division of the Texas Attorney General's Office in September 2021.
 - a. The letter provides law enforcement notice to Luong's Corporation that a law enforcement agency has reason to believe that activity described in Section 125.0017 of the Texas Civil Practice and Remedies Code has occurred at 5 Star Massage.
 - b. The letter describes specific activity believed to have occurred at 5 Star Massage that violates Section 125.0017 of the Texas Civil Practice and Remedies.
 - c. The letter describes that these are common indicators of human trafficking and includes a list of "red flags."
- 19. Exhibit 12 is a true and correct copy of a follow up letter sent to Luong Muoi and Luong's Corporation from the Human Trafficking Transnational Organized Crime Division of the Texas Attorney General's Office in September 2021.
 - a. The follow up letter references the original letter described in Exhibit 9.

Exhibit	it Name of Exhibit						
#	Redacted MSCO Incident Report						
2	Redacted MSCO Incident Report						
3	Photo of Front of 5 Star Massage						
4	Adultsearch ad – 2-26-22 - Redacted						
5	Bedpage ad 3-2-22						
6	Rubratings ad 9-1-21 - Redacted						
7	Ad 8-13-21 - Redacted						
8	Bedpage Ad 10-21-22						
9	MCAD Property Details – 415 Rayford Road						
10	Google Street View of 415 Rayford Road						
11	Letter from OAG to Luong's Corporation						
12	Follow Up Letter to Luong's Corporation						
13	Montgomery County Assumed Name Certificate						
14	SOS Records – 5 Stars Massage						
15	5 Star Massage TDLR License						
16	SOS Records – Luong's Corporation						
17	Online ad received from MCSO						

Charlene Gale

SUBSCRIBED AND SWORN TO BEFORE ME on this 27th day of Mor., 2023, to certify which witness my hand and official seal.

ZEILIC CONTRERAS
Notary Public-State of Texas
Notary ID #12576065-7
Commission Exp. Nov. 12, 2028
Notary without Bond

NOTARY PUBLIC IN AND FOR THE STATE OF TEXAS



MONTGOMERY COUNTY SHERIFF'S OFFICE

Deputy Report for Incident 21A240256

22A071407

Nature: INVESTIGATION Address: 415 RAYFORD RD, Sutie 100

Location: 1M SPRING TX 77386

Offense Codes:

Statute Codes:

Received By:

Responding Officers:

How Received: O Agency: MCSO

Responsible Officer: Disposition: ACT 08/02/21

When Reported: 15:29:07 08/02/21 **Occurred Between:** 15:29:07 07/01/21 and 15:29:07 08/02/21

Assigned To: Detail: Date Assigned: **/**/

Status: Status Date: **/***

Due Date: **/***

Complainant:

Last: First: Mid:
DOB: **/**

Dr Lic: Address:
Phone: Race: Sex: City: ,

Offense Codes

Reported: Observed:

Statute Codes

Circumstances

LT05 COMMERCIAL OR OFFICE BUILDING

Responding Officers:

Unit:

Responsible Officer:

Received By:

How Received: O OFFICER **When Reported:** 15:29:07 08/02/21

Judicial Status: ACT

Agency: MCSO

Last Radio Log: **:**:** **/**

Clearance: REP SEE REPORT **Disposition:** ACT **Date:** 08/02/21

Occurred between: 15:29:07 07/01/21

2 **2**

Misc Entry: NA **and:** 15:29:07 08/02/21

CAD Call ID:

Modus Operandi:Description:Method:SCENETYPE OF CRIME SCENEBUSINESS

Cad Comments:

Involvements

Date	Type	Description	Relationship
03/17/22	Name	WANG, YILI	ASSOCIATE
03/17/22	Name	YU, XIAO LING	ASSOCIATE
03/17/22	Name	LIN, MEL MEL	ASSOCIATE
08/04/21	Name	NOFFSINGER, FEI	ASSOCIATE
08/03/21	Name	5 STAR MASSAGE,	SUSPECT
08/03/21	Name	LUONG'S CORP.,	ASSOCIATE
08/02/21	Cad Call	15:29:07 08/02/21 INVESTIGATION	Initiating Call

Narrative In July of 2021 I, Detective massage parlor. Investigation to follow.	located information of possible illicit
Responsible LEO:	
Approved by:	
 Date	

Investigation into an illicit massage parlor.

Complainant:

State of Texas

Suspect:

5 Star Massage

Landlord:

Luong's Corp.

15055 Woodforest Blvd.

Channelview TX 77530

@gmail.com

Scene summery

The business is located at 415 Rayford Rd. Suite 100 Spring, TX 77386. The business is the west most business in a strip mall, which faces south. 5 Star massage has an "Open" and "Massage" LED sign above the door. The windows to the business are covered by advertisement or tinted, causing the business to not be viewed by the outside public. Above the door and to the west there is a camera pointed at the door of the establishment. The business is open 7 days a week from 0930 hours to 2100 hours. The phone number on the door is clearly marked at 832-245-6254.

SUPPLEMENT SECTION

I, Detective _____ am currently assigned to the Montgomery County Sheriff's Office Organized Crime Unit. Part of my responsibility is to work cases involving prostitution and reviewing illicit websites looking ongoing prostitution.

During the month of July 2021 I was reviewing a website www.Rubratings.com and located several advertisements for 5 star Massage, where the females are dressed provocatively. Rubratings is a website individuals can go to view illicit massage parlors in their area. The city selected for these advertisements were for Houston, TX.

I located advertising for the following days and they are listed as followed:

July 7th, 2021 July 8th 2021 July 13th 2021 August 1st 2021s

The advertisement provides the phone number of 832-245-6254 and the headline reads as followed "832-245-6254, new beautiful girls, 100% real young sexy". There are 5 images on the advertisement, which depicts 5 Asian females, who are partially covering their breast. 2 of the images the females are topless and are using their hands to cover their nipples and 3 of the image the females are using clothing/towel to cover their nipple. In all 5 images a large majority of the breast are exposed.

The advertisement provides the address of "415 Rayfor Rd Suite 100, Spring Tx 77386" and the ad reads as followed:

" 832 - 245 - 6254

415 Rayfor Rd Suite 100, Spring Tx77386

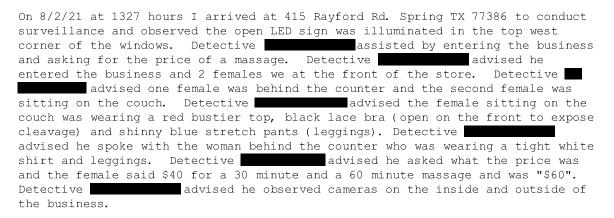
Top service real guy
New faces, new feelings, different experiences
I am exactly what you have been looking for, a sexy and beautiful Asian girl, I
provide an amazing skillful experience that will relax you
100% safe and clean
100% cautious
100% fun and open
100% amazing skills
Come see me"

Due to this information an investigation was opened into this massage parlor.

Disposition Active

Detective 8/2/21

Surveillance 8-2-21



When I arrive the following vehicles were on location and they are listed as followed:

(Not related, was customer of another business)

During the surveillance from 1327 hours to 1600 hours I witnessed 2 males either enter or leave the business and they are listed as followed:

1334 hours blue Nissan Armada (TX LP arrived and parked near the front of business. A younger Hispanic/White looking male wearing a white shirt, blue athletic pants and a backwards red Underarmor hat exited his vehicle and entered business. Male exited the business at 1345 hours. (Pictures of male and vehicle)

1403 hours a bald Hispanic male wearing a bright yellow shirt and black pants exited the business and entered his vehicle (TX LP (TX LP

1536 hours an Asian female with long hair wearing light pink shirt and dark leggings exited the business and entered her vehicle (TX LP ______). The vehicle exited the parking lot. I searched the license plate and the vehicle returns to a red 2018 Honda belonging to _____ and ____

I searched Fei Noffsinger and located a Texas driver's license of (Employee)

No female customers entered the business.

Pictures were taken during the surveillance period and the images were later submitted into evidence. The pictures were later burned to a DVD and submitted into evidence.

Disposition Active

Detective 8/2/21

Surveillance 8/3/21

On 8/3/21 at 0830 hours I arrived at 415 Rayford Rd Spring, TX 77386 to conduct surveillance. When I arrived the parking lot was empty and the "open" LED sign to the business was off.

I searched Montgomery County Appraisal District's website and located the owner

of the address and it is listed as followed:
Owner Name: LUONG'S CORP Owner ID: Mailing Address: 15055 WOODFOREST BLVD CHANNELVIEW, TX 77530 Agent: BEAUCHAMP & ASSOCIATES (
During the surveillance from 0830 hours to 1215 hours I witnessed 4 males enter and males leave the business and they are listed as followed:
At 0917 a red Honda (TX LP arrived in the parking lot and an Asian female wearing white shirt and black pants exited her vehicle and walked to the front door. The female used a key and opened the door and walked inside the establishment. The "open" LED sign, which was not on when I arrived, was turned on. (Employee). Due to this vehicle opening the business I searched the owner in TDLR's website and located a massage therapist license number with an expiration date of
At 1000 hours a black ford pick-up (Oklahoma LP backed into a parking spot directly in front of the business. The driver, an older white male wearing blue dress shirt and slacks, exited the vehicle and opened the rear driver's side door. The female front seat passenger, an Asian female wearing a red dress, exited the vehicle and both started taking bags into the business. The female seen opening the store exited the business and assisted in bringing bags (possibly grocery bags) into the business. I did observe the female in the red dress carry an ironing board from the back seat of the vehicle and bring it into the business. The two then get back into the vehicle and left the parking lot. Due to the there being no front license plate; I left my surveillance and followed the vehicle. I was able to confirm the license plate for the vehicle was an Oklahoma license plate. I then drove back to the business to conduct further surveillance. (Employee)
1100 hours a black GMC pick-up (TX LP arrived in the parking lot and parked directly in front of the business. A Hispanic male wearing a white shirt and tan shorts exited his truck and entered the business. At 1121 hours the Hispanic male exited the business and got into his truck and left. (Pictures of male going in, however, changing SD card when he left)
1110 hours a younger white male wearing grey shirt, black pants and a green hat entered the business. At 1130 hours the male exited the business and got into a white work truck with a possible TX LP of the website on the back tailgate was " '.
1121 hours the black pick-up from before (Oklahoma LP arrived and dropped of the female in the red dress and left the parking lot, who entered the business.
1125 a white male with a beard, grey shirt and black shorts entered the

establishment. The male parked a couple business down from 5 star Massage and I

was not able to see which vehicle he arrived in. It should be noted there were available parking spot directly in front of the business. At 1206 the male exited the business and walked towards his vehicle (only able to get a picture of his feet as a bush was obstructing the view, however, pictured entering the business).

1135 hours a white Dodge truck (TX LP pulled into the parking lot and parked near the street away from the business. A white male, beard, blue shirt and blue pants exited his vehicle and entered the establishment. At 1211 hours the male exited the business and entered his truck and left. (Pictures entering and exiting)

1150 black truck with Oklahoma plate backed into a parking spot directly in front of the business and was there when I completed my surveillance.

I witnessed two females enter the business, however, no female customers entered the business. It should be noted the males did not stay inside the business as very long. Most of the males witnessed were in the business from 20 to 30 minutes.

Pictures were taken during the surveillance period and the images were later submitted into evidence.

Disposition Active

Detective 8/3/21

Forward Case to Attorney General's Office.

SUPPLEMENT SECTION

During the investigation into this massage parlor I located several indicators this business is operating as an illicit massage parlor and they are listed as followed.

- 1) Primarily female employees
- 2) Mostly male customers
- 3) Cameras installed inside and outside the building
- 4) Outside window coverings to block a view of the inside
- 5) Advertisement on WWW.rubratings.com

Due to the findings in this investigation the report and advertisement will be forward to the Attorney General's Office for Nuisance Abatement.

Disposition

Referred to Attorney General's Office

Detective 8/3/21

INTRODUCTION:

ON 08/02/2021 at about 1330 hours, I Detective (assisted MCSO Det. In this investigation. I entered the 5 Star Massage located at 915 Rayford Road suite 100. I entered the business in a plain clothed capacity and posed as a possible client. As I was walking up to the front door, I noticed that there was a security camera above the front door and it was pointed towards the parking area directly in front of the business. When I entered the front door of the business, I was met by two unknown Asian females. The one that was behind the front desk greeted me and the one that was sitting on the couch by the front desk engaged me in conversation. This female was wearing a light red "bustier" that was open in the front. This garment seemed to be too small for her and it barely covered her breast. Under this garment, she was wearing a lacey black bra that showed her cleavage and a pair of light blue stretch pants that appeared to be several sizes too small. As I spoke to her, the female behind the front desk asked if I wanted a massage. I asked her for the price and she advised \$60.00 for an hour. It should be noted that this female was wearing a very tight white stretch shirt and black in color stretch pants. As I was standing in the front lobby I noticed that there was several surveillance cameras set up to view the interior of the business. I asked this female about their hours of operation and she advised that they were open until 9:30 pm (2130 hours.) I told the female that I had to go back to work, but I would come back on my way home. I then grabbed a business card from the front desk and exited the business.

Once I was back in my vehicle, I called Det. and relayed all of this information to him. It should be noted that when I looked at the business card, I noted that the name of the business was wrong as it showed to be 5 START MASSAGE and not 5 Star Massage.

DISPOSITITON:

Referred to Original report



Received Landlord letter from Attorney General's Office

SUPPLEMENT SECTION

On 9/3/21 I, Detective , received the Landlord letter for this case. The letter were mailed by the Attorney General's Office to the Landlord. I have attached the email and letter to this case.

Disposition

Referred to Attorney General's Office

Detective 9/15/21

Continued investigation

SUPPLEMENT SECTION

On 3/3/22 I was notified by JP3 the landlord did not provide any supportive information during the eviction hearing and the eviction was denied. Due to the eviction being denied the investigation into this establishment will continue.

Disposition Active

Detective 3/3/22

Surveillance 3/7/22

On 3/7/22 at 1200 hours Detective and I, Detective , arrived at 415 Rayford Rd Spring, TX 77386 to conduct surveillance. When we arrived the "open" LED sign to the business was on and there were vehicles in the parking lot. Detective and I concluded our surveillance at 1545 hours. During that time we observed 14 males enter into the establishment and no female customers.

At 1225 hours a black male with a dark shirt and grey pants entered the front door of the business. At 1306 a black male wearing a white face mask exited the business and entered his black BMW vehicle (TX LP Temp tag ______). The male then left west on Rayford road (pictures of male and vehicle were taken)

At 1234 hours a Hispanic male wearing grey hoodie exited the front door of the business and entered his vehicle, TX LP _____. The male then exited the parking lot west bound on Rayford Rd. (Pictures of male and vehicle)

1251 hours a grey SUV (TX LP parking in the parking lot. An older white male grey shirt and khaki pants exited his vehicle and entered the front door of the establishment. At 1320 hours the male exited the business and entered his vehicle. The male then left the parking lot headed west on Rayford Rd. (picture of male and vehicle)

At 1255 hours an unknown race individual with a hoodie covering his body and head, jeans and work boots entered the front door of the business. (Unknown vehicle)(Pictures of individual entering) At 1321 hours a Hispanic male wearing a hoodie on his body and head exited the front door of the business. The male also had a black face covering. The male entered his silver Dodge ram (TX LP and exited the parking lot headed west on Rayford Rd. (Picture of male and vehicle were taken)

At 1258 hours a Hispanic male wearing striped pants and a dark shirt exited the front door of the business and entered his vehicle (TX LP , which was parked in front of the front door (Pictures of male and vehicle taken). Unknown when male left.

At 1301 hours a white Jeep (TX LP parking next to the front door. A white male wearing blue shirt and grey sweat pants exited his vehicle and entered the establishment. At 1349 Hours the male quickly exited the front door of the business and entered his vehicle. The vehicle left west bound on Rayford road (pictures of vehicle and male were taken)

At 1327 hours a white GMC pick-up (TX LP parked in the parking lot and a white male wearing a white shirt and white baseball cap exited his vehicle and entered the business. The male was inside the business for approximately 1 minute and then exited the business and entered his vehicle and left the parking lot. It should be noted there were already three male individual inside the

business when he entered. (Pictures of male and vehicle were taken).

At 1356 hours a black Dodge Ram 3500 pick-up (TX LP parking in the parking lot. A white male wearing a blue and white baseball cap, blue shirt and jeans exited his vehicle and entered the front door of the business. At 1431 hours the male exited the front door of the business and entered his vehicle. The vehicle left west on Rayford Rd. (Pictures of male and vehicle were taken)

At 1428 hours a black BMW (TX LP parked directly in front of the business. A white male wearing a dark shirt exited his vehicle and entered the front door of the business. The black BMW was still on location when surveillance was completed.

At 1430 hours a tan SUV parked in front of the business. Unknown individual walked into the front door and within a couple minutes the vehicle left. (Bushes covering plate and person)(Pictures of vehicle leaving)

At 1535 hours a Hispanic male with a beard wearing a black shirt and black sweatpants entered the front door of the business. Unknown which vehicle the male arrived in (Pictures taken of the male entering the business).

At 1542 hours a black male wearing light blue long sleeve dress shirt and khaki pants entered the front door of the business. Unknown where male parked. (Pictures of male entering the business were taken)

1545 hours end surveillance.

Disposition Active

Detective 3/8/22

Under Cover Operation Supplement:

Event:

Under Cover Operations into 5 Star (415 Rayford Rd., #100 Spring, Texas

Narrative:

On March 10, 2022 at approximately 11:30 the Montgomery County Sheriff's Office, Organized Crime Unit conducted a prostitution buy walk operation at "5 Star Massage". Det. is currently investigating this establishment for nuisance abetment violations, and criminal activities. I (Det. was tasked as the under cover for this buy walk operation. During the briefing prior to the operation Det. provided me with two hundred dollars in cash. One hundred dollars were in twenty dollar bills, the second hundred were two fifty dollar bills. I placed one fifty dollar bill in my left front pocket, and the remainder of the money in my wallet. I was then provided with two audio and video covert surveillance equipment. One device was a live recording for the team to observed. The second device is backup and does not transmit and audio or video. At this time I was authorized by Lt.

(on scene) to disrobe for this operation. Once the briefing was completed plain cloths officers and a marked unit (deputy) staged in the area for under cover rescue.

Upon my arrival to the parking lot of 415 Rayford Rd, Spring, Montgomery County, Texas I observed 5 star massage on the west side of the strip center. At this time I turned on both surveillance devices, and provided an intro for the devices. I contacted Det. and verified that the device was working properly. I exited my vehicle and approached the front door of the establishment.

I entered the front door that was clearly marked under the marquee "5 Star". I observed the front counter on the left side of the structure, and a hallway on the right hand side. I heard a female voice that stated "Hello". I replied and then met by a female exiting one of the rooms in the hallway. She was an Asian female, with dark hair, and a purple one piece dress. The dress had a low cut "v" in the front exposing the top of her breast. Upon greeting me asked "massage" in a very thick accent. I stated "yes" and she began to wave for me to travel into the hallway to follow her. On my approach she met me putting her hand on my back and escorting me to the second room on the left hand side of the hallway. In the room I observed a chair to the left of the door, a bed/massage table in the center of the room, and a small cabinet in the far back left side of the room. In doing this we bypassed the front desk and I was not requested to fill out any new patient information.

Once in the room she asked if "ok", and I stated yes. She then placed a towel in the center of the bed, and stood in the back left corner of the room. I then began to disrobe, and observed that she was smiling and nodding her head "yes" as I was getting undressed. Once I was down to my undershorts, she reached over, touching my shorts, and gestured to take them off. I removed my shorts and was completely nude in front of the female. During this time I heard another female and possibly a male in the hallway. It appeared as if a male subject was leaving. At this time she asked "money". I reached into by left hand pocket and pulled out the fifty dollar bill, and asked for 30 mins. She stated it was forty for 30 mins plus a tip. I agree and provided her with the fifty. She then exited the room.

I laid face down on the massage table and waited for her to reenter the room. After a short period of time she reentered the room. She was still wearing the purple one piece dress. She began to rub my feet and my legs. After a short period of time she climbed onto the table, pulled her dress up and sat on my legs. She began to rub on my buttocks, and back. She asked if this was my first time here. It was difficult to understand her broken English. While on the table she moved to one side and sat on my right hand (back side of hand). She rubbed herself (vagina, through panties) on the back of my hand. I attempted to move and she stated it was "OK". She then moved position and I was able to brake the contact. She

then got of the table and rubbed my back, arms, and neck. She then stopped and asked me to turn over. Before I could turn she kissed my bare buttocks. At no time did she use any oils or creams.

Upon rolling over she began to rub my chest and asked if I was ready. She crawled up on the bed and was sitting to my right side. Her hands then drifted down to my pelvic region, and grabbed my penis. She then asked "Suck" indicating that she was offering oral sex. I asked her if she had a condom, she stated that she did have condoms. I asked her how much, and she held up two fingers. I stated \$200, and then informed her that was too much. At this time she pulled the top of her dress down exposing her breast, and stated they are small and began to rub and squeeze. I told her they were nice, then asked how much for just a massage naked. She did not appear to understand. I had to ask several times. She then grabbed my penis and began to stroke it up and down, stating "sucky, sucky". I told her no, this caused her to break contact. I then pointed to her pelvic region and asked her how much. She stated "all, boom, boom", as she was speaking she was physically gesturing sex by pushing her pelvic back and forth. I stated yes, she again said two hundred. I shook my head "no", at this time she again grabbed my penis and began to stroke up and down. I asked her what she would do for fifty dollars. In doing this i was able to get her to break contact. She repeated fifty, grabbed my penis and stated "hand". I waved her off, again expressing that I did not want a hand job (masterbate). I asked her how much to just rub on me, and physically rubbed my hands across my chest. She told me one hundred. She began speaking and I was not able to understand what she was saying. I stated to her that I do not hear very well. She again offered "boom, boom", and at this time I asked her if she had a condom, or if I had to bring my own condom. She stated that she had a condom. I then asked if I could bring a condom. She asked if I had one, and I stated I would have to bring one next time, I would prefer my own condom. I asked if she understood and she shook her head "no".

At this time she sat up on the table pulled her skirt up exposing dark colored panties, rubbed her self, asking if I wanted. I stated to her that it was too much money for today. I told her that I only had fifty with me. At this time she grabbed my penis and again began to stroke. I again waved her off and stated "I can do that myself", causing her to break contact. I told her that I could come back tomorrow.

She asked if I was married, and I stated "no, girlfriend". She stated "oh", and gestured scissors cutting a finger. She said "ok, next time. She then grabbed my penis. I told her no, and misunderstanding. She stopped. I then got up and gave her \$50.00 for the tip. She kept asking for more, and I told her no. She pushed back to the table, and left the room. She reentered the room and got a hot towel. At this time she began to use the hot towel on my arms and legs. While doing this she is still trying to talk me into oral sex. I told her that boom boom is better and that I will wait. She stated any money would be good, I shook my head no.

She finish the hot towels and then began to rub her breasts on my chest. During this time she would rub my arms and shoulders. She then grabbed my penis and asked "sucky". I again waived her off and said no, and she broke contact. I wanted to wait for boom boom. She did this several more times. She further did the "hand job" motion, and stated "no charge". Told her that I can do that myself. Due to the case being made, and her aggressive nature, I asked about the time. She sat up and pointed to the clock and tried to explain the time. I was not able to understand, used this sit up and create distance. I told her I don't understand. She leaned over and started to rub my shoulders. I asked her for her name and she stated that she is "Lisa". She scooted closer and continued to rub my shoulders. She then stated five minutes, and reached down to grab my penis. I brushed her off and stood up, and told her I have to work. As I stood up she patted by buttocks, and then leaned back on the table. With both of her legs on the table, then opened her legs. She then pulled her panties to the side, exposing her vagina. I told her "I see", I see,". She then asked if I liked. I stated "very nice, next time".

At this time a second female began to speak (foreign language) to Lisa through the door. Lisa replied, and I asked if she was taking too long. She stated yes. As I was getting dressed she continued to touch me, then turned on the lights, and exited the door. I could hear her speaking with a second person. Upon her return I was still getting dressed, and she left the door open. At this time I asked if they had a shower for next time "boom, boom". She stated yes, next time. I then observed a second Asian female walk past the door. She was wearing a white shirt and black skirt.

I asked if she was always at this location. Lisa stated that she is always here. I then asked the time. She exited the room and returned with a cell phone. Lisa used the phone for google translate. I discovered that they are open till 2am. I stated to her that is a long day. They open at 7am in the morning. I stated to her that is a lot of "boom, boom", she stated "yes". I then asked for her phone number, she pointed and stated up front. After I was completely dressed she escorted me to the font door. She pointed to the door, and showed me the phone number. She then gave me a hug and again grabbed my penis over my clothing, and stated "more money". I then left the location. Once I reached my vehicle I ended the recording.

I provided the events that occurred, along with a description of Lisa to Det. Erickson.

Upon the review of the video evidence it was discovered that one of the devices (secondary) shut off as I exited my vehicle.

The audio video will be submitted as evidence to the MCSO crime lab.



Surveillance 3/9/22

SUPPLEMENT SECTION

On 3/9/22 at 1200 hours Detective and I, Detective , arrived at 415 Rayford Rd Spring, TX 77386 to conduct surveillance. When we arrived the "open" LED sign to the business was on and there were vehicles in the parking lot. Detective and I concluded our surveillance at 1617 hours. During that time we observed only male customers either entering or leaving the establishment and no female customers.

At 1306 hours a white GMC pick-up backed into a parking spot near the front door of the business. A white male with a brown shirt exited his vehicle and entered the front door of the business (Pictures taken of male). At 1315 hours exited the business and exited the parking lot.

At 1334 hours a black GMC pick-up backed into a parking spot near the front door. An older white male wearing a white long sleeve shirt, grey vest and blue jeans exited his vehicle and entered the front door of the business. At 1345 the male came out, sat in his vehicle for about 10 minutes, took off his vest, straitened his shirt and reentered the business. At 1410 hours the male exited the front door of the business and entered his truck. The vehicle turned west onto Rayford Rd and I was unable to get a picture of the license plate (No front license plate) (Pictures of male entering and exiting business).

At 1449 hours a red mustang (TX LP pulled up and parked in a parking spot directly in front of the business. The male got out of his vehicle walked down the strip center and entered Hunan Jade Chinese restaurant. The male immediately exited the restaurant and walked back down to his vehicle and entered 5 star massage. Male was wearing a long sleeve dress shirt and khaki pants. At 1455 hours the male exited the business and entered his vehicle.

At 1515 hours a white pick-up parked one business down from 5 Stars Massage. A white male (balding) wearing a black polo exited his vehicle and entered the front door of the business. At 1534 hours the male exited the business and entered Zara's Mediterranean kitchen and quickly exited and entered his vehicle. The vehicle turned wet onto Rayford road. Picture of male and vehicle were taken however only the first 5 were obtained. TX LP (obstructions covered last part).

At 1515 hours a black GMC pick-up (TX LP pulled into the parking lot and parked near Rayford Rd (South end of parking lot). At 1523 hours a white male with a black shirt and baseball hat exited his vehicle and walked to the front door of the business. The male appeared to have tried pulling on the door and it was locked. The male knocked on the door and shortly after the door opened and the male entered. Within 1 minute the male walked back out to his truck and eventually left the parking lot.

At 1539 hours a white SUV (Utah plate) pulled into the parking lot. White male wearing long sleeve white shirt, blue jeans and brown shoes exited his vehicle and walked to the front door of the business. The male tried pulling on the handle however the door was locked. The male knocked twice on the door and the

door eventually was opened from the inside. The male walked in and under 40 seconds later left and walked back to his vehicle. (unable to obtain picture of plate)

At 1555 hours a white male with checkered long sleeve shirt walked up to the business and pulled the handle, which was locked. The male knocked and the door opened form the inside. (Pictures of male taken)

At 1603 hours a white Lexis SUV (TX LP parked in a parking spot closest to Rayford Rd. An older male wearing a flannel shirt and jeans walked to the front door and walked into the business. (Pictures of male and vehicle taken).

At 1609 hours the Utah white SUV (Utah plate entered the parking lot again and parked closest to Rayford Road. The same older male wearing long sleeve and pants walked to the front of the business and again it was locked. The male knocked on the door and the door opened form the inside. The male walked into the business and shortly after the male exited the business and walked back to his vehicle (I was able to obtain a picture of the license plate).

Detective and I concluded our surveillance at 1617 hours. Pictures of the males and vehicle were later burned to a DVD and submitted into evidence.

Disposition Active

Detective 3/11/22

Buy walk operation 3/10/22

Suspect

Lin, Mel Mel A/F 055

Associates:

Yu, Xiao Ling A/F 042 Wang, Yili A/F 051

SUPPLEMENT SECTION

On 3/10/22 the Montgomery County Sheriff's Office, along with HSI, conducted a buy walk operation at 5 Stars Massage located at 415 Rayford Rd Suite 100 Spring, TX 77386.

Prior to the operation, at an undisclosed location, I conducted a safety briefing. During the briefing the undercover officer (UC) was provided with two covert undercover recording devices and \$200.00 of impressed funds.

After the briefing the UC rescue team arrived near the location and I contacted the UC and advised we were set up. The UC arrived at the location and entered the front door of the business. During the massage the masseuse, later identified as Mel Mel Lin, A/F touched the UC's genitalia. The UC broke contact and Lin said "suck" and the UC asked how much. Lin held up two fingers and the UC's confirmed the price by saying "\$200", which Lin said yes. A conversation ensue where the masseuse stated oral sex would be \$200 and straight sexual intercourse was \$200. See UC's Supplement for more information. The UC exited the establishment and turned off his undercover covert recording devices. It should be noted while the UC was inside the establishment a white male wearing a blue shirt and grey pants exited the front door of business and entered his Ford F150, which was parked directly in front of the business.

After the UC left the location and was secure, Spec. entered the establishment for an inspection. During the course of the inspection one female, Mel Mel Lin, was location in the establishment and two females, Xiao Yu and Yili Wang, were in a wooded lot behind the establishment. Detective located the females who advised they had nothing to do with the establishment. After the UC was able to confirm one of the females were in the establishment; the female was brought back to the business. The females were eventually identified by documents found inside their luggage. Lin was cited for preforming massages without a license. See Detective supplement for information. See Spec.

Disposition Active

Detective 3/17/22

Detective Supplement - Locating females associates of massage parlor

On 03/10/2022 I Detective assisted with a massage parlor operation which was followed up with an inspection. Specialist went into the establishment 5 star Massage located at 415 Rayford Spring TX. When Specialist entered the business there was only one girl working at the establishment. Just prior to him entering an undercover operation was conducted and there were at least two Asian females working at the establishment. There is a back exit to the business. Due to my training and experience I know that employee will sometimes leave the business during an inspection if they are unlicensed so they do not receive a citation for practicing without a license. There is a heavily wooded area next to the business. I went over to the area and walked around. Upon entering the densely wooded area I found two Asian females just standing in One was wearing a heavy blue puffer jacket and the other had on a mini skirt with a slit and low heeled pointed shoes. I made contact with them and introduced myself. It was necessary to use google translate to communicate as they indicated they did not speak English. I asked them if they worked at the massage parlor and they stated no. I told them they were just seen leaving there and they advised it was a mistake. They stated they know a man who works there and he speaks Chinese and that is why the person was mistaken. They advised they have a friend who works in the area, they were specific that they don't work or live in the area, and they take walks in the woods while they wait for him to work. I took their photograph to confirm they had been seen on location. I placed a phone call to confirm they had been at the spa. They walked away while I was on the phone. I relocated them after I was advised they were at the spa. I then escorted them back to 5 star massage for identification. HSI located luggage during the inspection and were able to confirm their identification while on the premises. Two of the females were here on expired visitor visas and one was here on a current visitor visa. No one had a work visa, nor did they possess a massage license. The females I located in the woods maintained they were passing through and denied they were staying at or living at the business. They both had luggage on location. See Specialist Jolly's supplement for identification of the females.

Detective
Montgomery County Sheriff's Office
Organized Crime Unit/HTRA

Name Involvements:

ASSOCIATE:

Last: LUONG'S CORP. First: Mid:

DOB: **/**

Dr Lic:
Address: 15055 WOODFOREST BLVD

Phone:
Race: Sex:
City: CHANNELVIEW, TX 77530

Cell Phone: Work Phone: Employer:

Local ID:

SUSPECT:

Last: 5 STAR MASSAGE First: Mid:

DOB: **/*** **Dr Lic: Address:** 415 RAYFORD RD; SUITE

100

Phone: General Race: Sex: City: SPRING, TX 77386

Cell Phone: Work Phone: Employer:

ASSOCIATE :

Local ID:

Last: YU First: XIAO Mid: LING

DOB: Dr Lic: Address: Phone: Race: A Sex: F City:

Cell Phone: Work Phone: Employer: UNEMPLOYEED

Local ID:

ASSOCIATE:

Last: LIN First: MEL Mid: MEL

DOB: Dr Lic: Address: Phone: Race: A Sex: F City:

Cell Phone: Employer: 5 STAR MASSAGE

Local ID:

ASSOCIATE:

Last: WANG First: YILI Mid:

DOB: Dr Lic: Address: Phone: Race: A Sex: F City:

Cell Phone: Work Phone: Employer: UNEMPLOYED

Local ID:

ASSOCIATE:

Last: NOFFSINGER First: FEI Mid:

DOB: Dr Lic: Address: Address: Phone: Race: A Sex: F City: Employer: Local ID:





Houston Shemale Escorts

Gay Escorts

Meet & Fuck Live Escorts

⊕ Houston
∨ EN
∨





+ Post Ad Feedback FAQ Login Register

















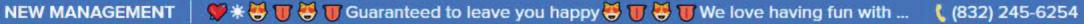




Home > USA > TX > Houston > Female Escorts > (832) 245-6254

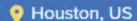
























About NEW MANAGEMENT

Location 415 Rayford Rd Spring

23 years old, Asian Stats

Languages English,

Available To Men

Incall Yes

Outcall No

Contact

(832) 245-6254 Phone

Mention you saw this ad on

AdultSearch.com

A Little More

♥HI GENTLEMEN♥

NEW ASIAN GIRLS LINE UP FOR YOU

832-245-6254 Sun - Thu: Open 7am - 12am, Frid, Sat 7am - 2am

!!RELAX WITH BEAUTIFUL ASIAN STAFF MAGIC TOUCH YOUR #1 CHOICE!!

!!We Do Nice Bodywork For U & Best service (MUST TRY !)!!

▼★NO RUSH! ★NO DRAMA! ★CLEAN PRIVATE ROOMS!

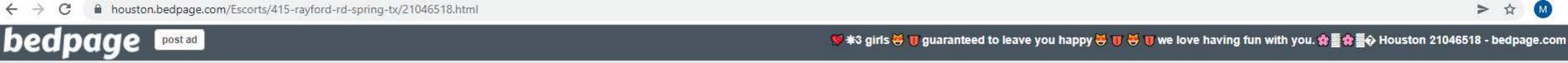
SHOWER Together

Silky Skin

NUNU B2B MASSAGE MUTUAL TOUCHE

Four Hands Servive Deep Tissue massage





Home > United States > Texas > Houston > Escorts



• 109 Views | Posted : Wednesday, March 02, 2022 06:37 PM

View Similar Ads

- **WHI GENTLEMEN**
- NEW ASIAN GIRLS LINE UP FOR YOU
- : 832-245-6254 Open 7am 12am
- ♥ !!RELAX WITH BEAUTIFUL ASIAN STAFF MAGIC TOUCH YOUR #1 CHOICE!! ♥
- !!We Do Nice Bodywork For U & Best service (MUST TRY !)!!
- ♥ ★NO RUSH! ★NO DRAMA! ★CLEAN PRIVATE ROOMS! ♥

SHOWER Together

Silky Skin

NUNU B2B MASSAGE

MUTUAL TOUCHE

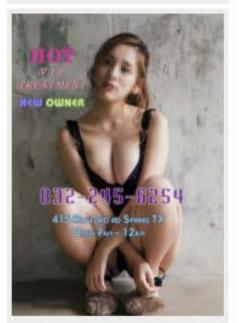
Four Hands Servive

Deep Tissue massage

- 415 Rayford Rd, Spring, TX 77386
 - · Poster's age: 22
 - Mobile: 8322456254
 - · Location: 415 Rayford Rd, Spring, TX
 - · Post ID: 21046518



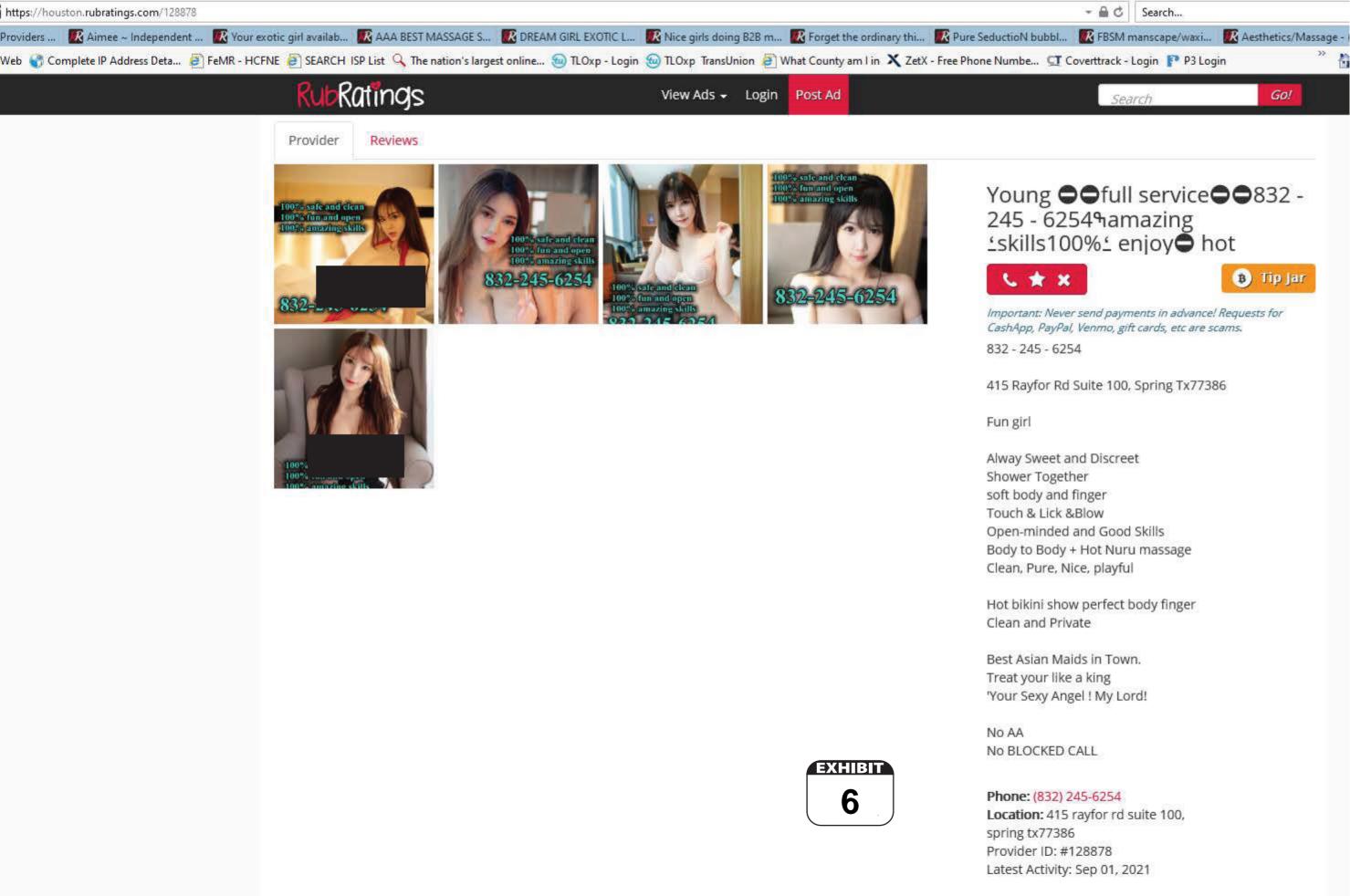












RubRatings > Houston, TX Body Rubs > 5 5 281 - 780 - 4280 New sexy hot girl 100% young 100% beautiful 100% new girl 5

Provider

Reviews









© © 281 - 780 - 4280 new sexy hot girl 100% young 100% beautiful 100% new girl 5

Important: Never send payments in advance! Requests for







415 Rayfor Rd Suite 100, Spring Tx77386 CALL: 281 - 780 - 4280

7days 9:30am-9:30pm

2 new girls, beautiful, young and sexy, can meet your every need, the room is clean, tidy and quiet

Hi Gentlemen We are New here! We rready to provide u with the best service! Pretty and sexy Asian Girls, Silky soft skin Pretty face Hot sexy body as u can see We have curves that will make u say "WOW"! Clean Private Rooms

100% Safe

100% Fresh Clean

100% Playful & Open Minded

Let us help u relax & put a smile on ur facewill relieve your exhaustion.

FULL BODY RUB AND MORE FUN!!!

EXHIBIT

Phone: (281) 780-4280

Location: 415 rayfor rd suite 100,

spring tx77386 Provider ID: #132800 Latest Activity: Aug 13, 2021









Get Directions

D!!@

♥!! RELAX WITH BEAUTIFUL ASIAN STAFF MAGIC TOUCH YOUR #1 CHOICE!! ♥

!! We Do Nice Bodywork For U & Best service (MUST TRY

ANO DUCULANO DRAMALACI SAN DRIVATE DOOME



SHOWER Together

Silky Skin

NUNU B2B MASSAGE

MUTUAL TOUCHE
Four Hands Servive

Deep Tissue massage

415 Rayford Rd, Spring, TX 77386



Poster's age: 2

MONTGOMERY CENTRAL APPRAISAL DISTRICT

Property	Owner	Property Address	Tax Year	2022 Assessed Value
R319397	LUONG'S CORP	415 RAYFORD RD, SPRING, TX 77386	2022 🔻	\$1,120,950

2022 GENERAL INFORMATION

Property Status	Active	Impro		
Property Type	Real	Improvem		
Legal Description	RAYFORD RIDGE 01, RES A, ACRES 0.8859			

Neighborhood SCO NONCITY FRONT RAYFORD RD

Account 8229-00-07200

Related Properties P360450, P447198, P00304

Map Number 252X

2022 OWNER INFORMATION

LUONG'S CORP Owner Name Owner ID 00076907

Exemptions

Percent Ownership 100%

Mailing Address 15055 WOODFOREST BLVD CHANNELVIEW, TX 77530

BEAUCHAMP & ASSOCIATES (A0055518)

2022 VALUE INFORMATION

rovement Homesite

N/A Value

ment Non-Homesite N/A Value

Total Improvement Market \$812,242

Land Homesite Value N/A Land Non-Homesite Value N/A

Land Agricultural Market N/A

Total Land Market Value \$308,710

> Total Market Value \$1,120,952

Agricultural Use \$0 Timber Use \$0

Total Appraised Value \$1,120,950

Homestead Cap Loss Total Assessed Value \$1,120,950

N/A values are not applicable toward total value.

2022 ENTITIES & EXEMPTIONS

TAXING ENTITY	EXEMPTIONS	EXEMPTIONS AMOUNT		TAXABLE VALUE	TAX RATE PER 100	TAX CEILING
CAD- Appraisal District			\$0	\$1,120,950	0	0
DD6- Mont Cnty DD 6			\$0	\$1,120,950	0.14	0
F08- Emergency Ser Dist #8			\$0	\$1,120,950	0.0999	0
GMO- Montgomery Cnty			\$0	\$1,120,950	0.4083	0
HM1- Mont Co Hospital			\$0	\$1,120,950	0.0567	0
JNH- Lone Star College			\$0	\$1,120,950	0.1078	0
MSM- So Mont Co MUD			\$0	\$1,120,950	0.16	0
SCO- Conroe ISD			\$0	\$1,120,950	1.176	0
TOTALS					2.1487	

2022 IMPROVEMENTS

¥ Expand/Collapse All

Improvement #1	State Code	Home	esite	Total Main Ar	ea (Exterior Measured) M	arket Value
-	F1 - Commercial (real)	No		-	N/	/A
		\				4 0 0 11

RECORD	TYPE	YEAR BUILT	SQ. FT	VALUE	ADD'L INFO
1	Retail Store	2006	7,050	N/A	➤ Details
2	Commercial Porch Open	2006	564	N/A	
3	Carport	2006	1,472	N/A	

Improvemen	t #2 State Code	Hom	esite	Total Main A	rea (Exterior Mea	asured) Market Value
-	F1 - Commercial (real)	No		-		N/A
RECORD	TYPE	YEAR BUILT	SQ. FT		VALUE	ADD'L INFO

1	Paving - Concrete Average	2006		2,490	N/A	¥ Details
Improvement #3 State Code - F1 - Commercial (real)		Hom No	esite	Total Main	Area (Exterior M	easured) Market Value N/A
RECORD	TYPE	YEAR BUILT	SQ. FT		VALUE	ADD'L INFO
1	Paving - Asphalt	2006		14,100	N/A	¥ Details

2022 LAND SEGMENTS

TOTALS						38,589 Sq. ft / 0.885882 acres	
1 - Primary Site	F1 - Commercial (real)	No	N/A	\$0	\$0	38,589 Sq. ft	
LAND SEGMENT TYPE	STATE CODE	HOMESITE	MARKET VALUE	AG USE	TIM USE	LAND SIZE	

VALUE HISTORY

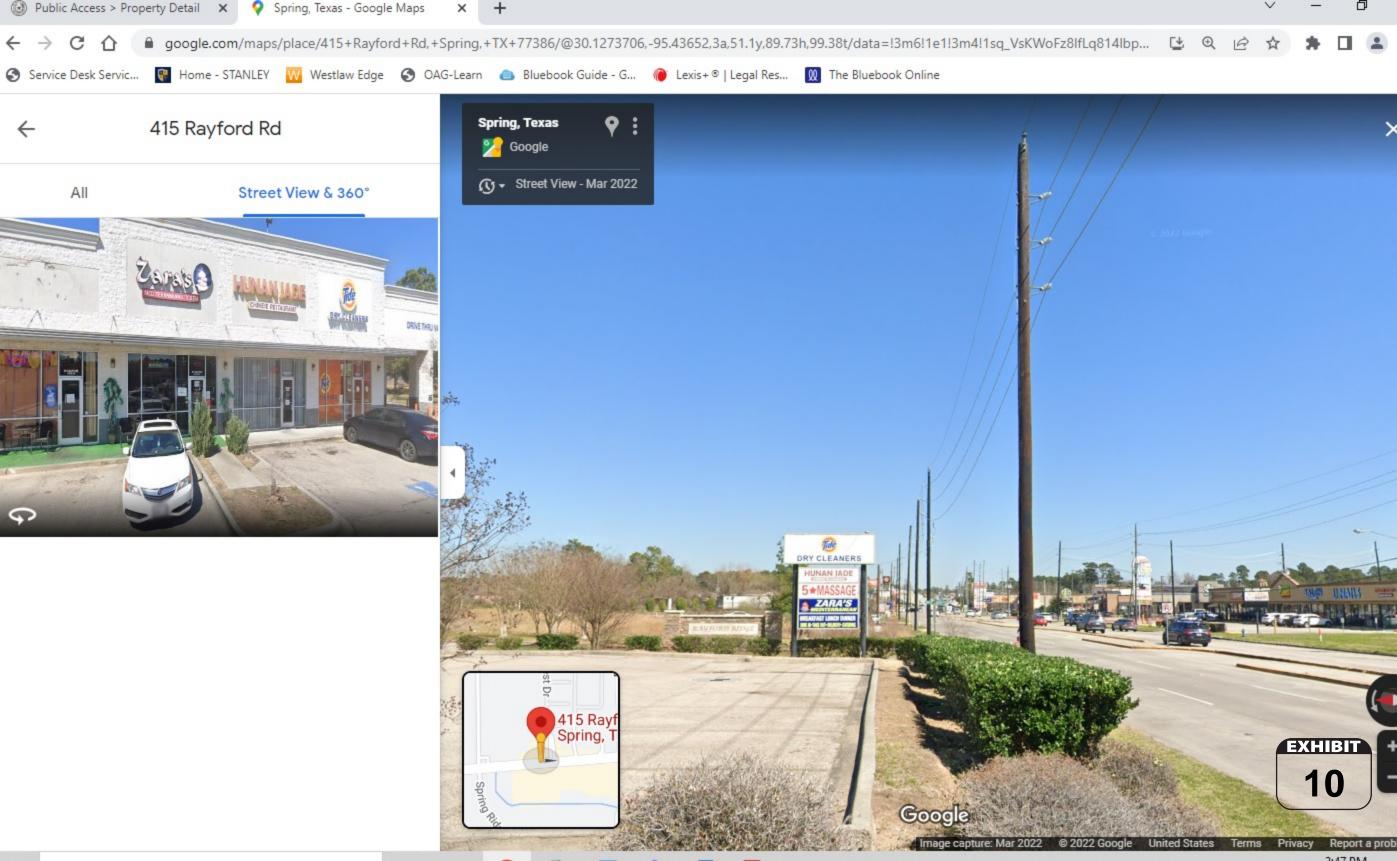
YEAR	IMPROVEMENT	LAND	MARKET	AG MARKET	AG USE	APPRAISED	HS CAP LOSS	ASSESSED
2021	\$461,290	\$308,710	\$770,000	\$0	\$0	\$770,000	\$0	\$770,000
2020	\$461,290	\$308,710	\$770,000	\$0	\$0	\$770,000	\$0	\$770,000
2019	\$424,490	\$308,710	\$733,200	\$0	\$0	\$733,200	\$0	\$733,200
2018	\$515,220	\$308,710	\$823,930	\$0	\$0	\$823,930	\$0	\$823,930
2017	\$376,530	\$308,710	\$685,240	\$0	\$0	\$685,240	\$0	\$685,240

SALES HISTORY

DEED DATE	SELLER	BUYER	INSTR #	VOLUME/PAGE
8/17/2007	DMA RAYFORD RIDGE RETAIL CENTER LP	LUONG'S CORP	-	420.11/0463
10/24/2005	DAVID ANTONIONO INV INC	DMA RAYFORD RIDGE RETAIL CENTER LP	-	941.10/0323
5/25/2005	MPL DEVELOPMENT LP	DAVID ANTONIONO INV INC	-	829.10/2500

DISCLAIMER

Every effort has been made to offer the most current and correct information possible on these pages. The information included on these pages has been compiled by County staff from a variety of sources, and is subject to change without notice. The Montgomery Central Appraisal District makes no warranties or representations whatsoever regarding the quality, content, completeness, accuracy or adequacy of such information and data. The Montgomery Central Appraisal District reserves the right to make changes at any time without notice. Original records may differ from the information on these pages. Verification of information on source documents is recommended. By using this application, you assume all risks arising out of or associated with access to these pages, including but not limited to risks of damage to your computer, peripherals, software and data from any virus, software, file or other cause associated with access to this application. The Montgomery Central Appraisal District shall not be liable for any damages whatsoever arising out of any cause relating to use of this application, including but not limited to mistakes, omissions, deletions, errors, or defects in any information contained in these pages, or any failure to receive or delay in receiving information.





September 2, 2021

Luong Muoi & Luong's Corporation 15055 Woodforest Blvd Channelview, TX 77530

Certified Mail No. 7020 0090 0000 7448 6041 Return Receipt Requested

Re: 5 Star Massage at 415 Rayford Rd Ste 100 Spring, TX 77386

NOTICE BY LAW ENFORCEMENT PURSUANT TO TEX. CIV. PRAC. AND REM. CODE 125.0017

Dear Luong Muoi & Luong's Corporation,

The Texas Attorney General (OAG) and the Montgomery County Sheriff's Office are determined to address the growing problem of illicit massage businesses in the State of Texas. An illicit massage business is a massage establishment where the employees engage in prostitution – very often because they are forced to do so. This is called human trafficking. We need the help of property owners like you to end human trafficking in Montgomery County and the State of Texas.

Pursuant to Texas Civil Practice and Remedies Code (CPRC) Section 125.0017, this letter serves as notice that a law enforcement agency has reason to believe that activity described by CPRC 125.0015(a)(6), (7), (18) has occurred at 5 Star Massage. More specifically:

- 5 Star Massage is operating without a valid massage therapy license.
- 5 Star Massage has surveillance cameras monitoring both the inside and outside of the establishment.
- 5 Star Massage has its windows covered.
- 5 Star Massage is open 7 days a week from 9:30am to 9:00pm.
- The overwhelming majority of customers at 5 Star Massage are men.
- The phone number and address associated with 5 Star Massage appear multiple times on a commercial sex website where illicit massage businesses advertise.

These are common indicators of human trafficking. I have also enclosed a list of "red flags" known to be common among illicit massage businesses that will allow you to further evaluate the operation of 5 Star Massage after receiving this letter. We encourage you to educate yourself about the various ways the illicit massage industry recruits and exploits vulnerable women, and I am happy



to have an in-depth discussion with you to help deepen your understanding of trafficking and exploitation in massage parlors.

We hope you will take all of the appropriate actions needed to ensure that illegal activity is not occurring on your property. We would also like to direct your attention to a few relevant provisions of Texas law.

- Texas Property Code Sec. 93.013 provides that a landlord who reasonably believes a tenant is using the leased premises or allowing the leased premises to be used for prostitution may file a forcible detainer suit seeking possession of the property.
- Texas Business & Commerce Code Sec. 17.46(b)(33) makes it a violation of the Deceptive Trade Practices Act to own, maintain or advertise a massage establishment that operates in violation of Tex. Occ. Code Chapter 455 or local ordinances that regulate massage establishments.
- Texas Penal Code 20.07 makes it a crime for a person to knowingly *permit* another to use any real estate or building owned by the person to commit the offense of smuggling of persons, trafficking of persons, compelling prostitution, or aggravated promotion of prostitution.
- CPRC 125.0015(a)(6), (7), (18) and (20) make the operation of an illicit massage business a common nuisance. CPRC 125.002 allows the Texas Attorney General to file suit against the property, the business or the landowner to abate the nuisance. Now that you have received this letter, future occurrences of this kind of activity will provide prima facie evidence in a nuisance abatement suit that you knowingly tolerated the activity and did not make reasonable attempts to abate it. See CPRC 125.004 (effective Sep. 1, 2021).

Unfortunately, there are more than 1,000 suspected illicit massage businesses in the State of Texas. So, the sheer number of these illegal businesses makes investigating, prosecuting, and filing suit against each one nearly impossible. For that reason, we ask that you do your part to ensure that this kind of activity is not tolerated in your community.

When you receive this letter, please contact me at the phone number or email address below so that we can talk more about how we can work together on this. I look forward to hearing from you.

Sincerely,

John Ramsey

Assistant Attorney General

Human Trafficking / Transnational Organized Crime Division

Office the Texas Attorney General

(512) 936-9906

john.ramsey@oag.texas.gov

CC: Montgomery County Sheriff's Office



September 29, 2021

Luong Muoi & Luong's Corporation 1203 Chartres St Houston, TX 77003 **Via first class mail**

Re: 5 Star Massage at 415 Rayford Rd Ste 100 Spring, TX 77386

Dear Luong Muoi & Luong's Corporation,

Please find enclosed a letter that I originally sent to you via certified mail on September 2, 2021. Since we have not received a response to our certified letter, I wanted to send another copy by first class mail. Please note that pursuant to Tex. Civ. Prac. & Rem. Code 125.004(a-3), you are deemed to have received notice 7 days from the date of the original letter. I look forward to working with you.

Sincerely,

John Ramsey

Assistant Attorney General

Human Trafficking / Transnational Organized Crime Division

Office of the Texas Attorney General

(512) 936-9906

john.ramsey@oag.texas.gov

CC: Montgomery County Sheriff's Office



Montgomery County Clerkoba 202101839 Mark Turnbull FILED AND RECORDED 06/23/2021 11:1640

Donna Walters

ASSUMED NAME CERTIFICATE HONTGOMERY COUNTY, TEXAS **Certificate of Ownership for an Unincorporated Business**

PURSUANT TO THE PROVISION OF BUSINESS AND COMMERCE CODE OF THE STATE OF TEXAS, THE UNDERSIGNED CERTIFIES THE FOLLOWING:

ASSUMED NAME:		BUSINESS ADDRESS: 415 Rayford Rd Ste 100		
5 Star Massage		•	hysical address/NO P.O. Box)	
Do you have or will you have a busine If no, do you have or will you have a b The period, not to exceed ten (10) yea	ess office in Mon ousiness office ir	tgomery County? another county?	ty, State & Zip Code) YES NO YES NO e will be used is 5 years.	
I hereby state this registrant is (mark a ☑AN INDIVIDUAL ☐AN ESTATE ☐COMPANY OTHER THAN A REAL jurisdiction under the laws of wh	☐ A PARTNE! ☐ A REAL ES' ESTATE INVES'	RSHIP TATE INVESTMENT TMENT TRUST. The		
I further state that this registrant is no partnership, or foreign entity.	t a limited partn	ership, limited liabi	lity company, limited liability	
Is any registrant a military veteran? REGISTRANT NAME(S) August Jones			vide a copy of your military ID. E ADDRESS(ES)	
August volles		Texas 77386		
agent & form	SIGNATU	RE(S)		
State of County of Sworn and subscribed to before me of CATHERYN Notary Public, St Comm. Expires Notary ID 12	FRENCH tate of Texas 01-10-2025	State of County of	ine film 2021 ary Publik EXGS Conformery	

Secretary of State P.O. Box 13697 Austin, TX 78711-3697 FAX: 512/463-5709

Filing Fee: \$300



Certificate of Formation Limited Liability Company

Filed in the Office of the Secretary of State of Texas Filing #: 804186758 08/11/2021 Document #: 1071284150004 Image Generated Electronically for Web Filing

Article 1 - Entity Name and Type

The filing entity being formed is a limited liability company. The name of the entity is:

<u> 5 STARS MASSAGE, LLC</u>

Article 2 – Registered Agent and Registered Office

A. The initial registered agent is an organization (cannot be company named above) by the name of:

OR

▼B. The initial registered agent is an individual resident of the state whose name is set forth below:

Name:

HONGXIA SUN

C. The business address of the registered agent and the registered office address is:

Street Address:

415 RAYFORD RD #100 SPRING TX 77386

Consent of Registered Agent

A. A copy of the consent of registered agent is attached.

OR

☑B. The consent of the registered agent is maintained by the entity.

Article 3 - Governing Authority

A. The limited liability company is to be managed by managers.

OR

Title: Manager

□B. The limited liability company will not have managers. Management of the company is reserved to the members. The names and addresses of the governing persons are set forth below:

Manager 1: HONGXIA SUN

Address: 415 RAYFORD RD #100 SPRING TX, USA 77386

Article 4 - Purpose

The purpose for which the company is organized is for the transaction of any and all lawful business for which limited liability companies may be organized under the Texas Business Organizations Code.

Supplemental Provisions / Information

I ne attached addendum, if any, is incorporated herein by reference.]
Organizer
The name and address of the organizer are set forth below.
HONGXIA SUN 415 RAYFORD RD #100, SPRING, TX 77386
Effectiveness of Filing
☑A. This document becomes effective when the document is filed by the secretary of state.
OR
☐B. This document becomes effective at a later date, which is not more than ninety (90) days from the date of its signing. The delayed effective date is:
Execution
The undersigned affirms that the person designated as registered agent has consented to the appointment. The undersigned signs this document subject to the penalties imposed by law for the submission of a materially false or fraudulent instrument and certifies under penalty of perjury that the undersigned is authorized under the provisions of law governing the entity to execute the filing instrument.
HONGXIA SUN

FILING OFFICE COPY

Signature of Organizer

Form 401

Secretary of State P.O. Box 13697 Austin, TX 78711-3697 FAX: 512/463-5709

Filing Fee: See Instructions



Statement of Change of Registered Office/Agent

Filed in the Office of the Secretary of State of Texas Filing #: 804186758 08/22/2022 Document #: 1171619730002 Image Generated Electronically for Web Filing

Entity Information

The name of the entity is:

5 STARS MASSAGE, LLC

The file number issued to the entity by the secretary of state is: 804186758

The registered agent and registered office of the entity as currently shown on the records of the secretary of state are:

<u>HONGXIA SUN</u>

415 RAYFORD RD #100, SPRING, TX, USA 77386

Change to Registered Agent/Registered Office

The following changes are made to the registered agent and/or office information of the named entity:

Registered Agent Change

A. The new registered agent is an organization by the name of:

OR

□B. The new registered agent is an individual resident of the state whose name is:

Registered Office Change

C. The business address of the registered agent and the registered office address is changed to:

24939 BASTIANI CANVAS LN, KATY, TX, USA 77493

The street address of the registered office as stated in this instrument is the same as the registered agent's business address.

Consent of Registered Agent

A. A copy of the consent of registered agent is attached.

☑B. The consent of the registered agent is maintained by the entity.

Statement of Approval

The change specified in this statement has been authorized by the entity in the manner required by the BOC or in the manner required by the law governing the filing entity, as applicable.

Effectiveness of Filing

A. This document becomes effective when the document is filed by the secretary of state.

B. This document becomes effective at a later date, which is not more than ninety (90) days from the date of its filing by the secretary of state. The delayed effective date is:

Execution

The undersigned signs this document subject to the penalties imposed by law for the submission of a materially false or fraudulent instrument.

Date: **August 22, 2022**

HONGXIA SUN

Signature of authorized person(s)



Name: 5 STAR MASSAGE dba 5 Star Massage

License Type: Licensed Massage Therapy Establishment

License Status: Current

Expiry Date: 08/29/2023

Effective Rank Date: 08/30/2021

Addresses

Mailing Address Address

SPRING , TX MONTGOMERY 77386-3550

US

Main Address Address

415 Rayford Rd Ste 100 SPRING, TX MONTGOMERY 77386-3550 US

Phone Number:

281-780-4280

Primary Loc Address

415 Rayford Rd Ste 100 SPRING , TX MONTGOMERY 77386-3550 US

Phone Number:

281-780-4280

15

ARTICLE OF INCORPORATION

FILED
In the Office of the
Secretary of State of Texas

OF

AUG 6 1998

LUONG'S CORPORATION

Corporations Section

ARTICLE ONE

The name of the Corporation is LUONG'S CORPORATION.

ARTICLE TWO

The period of its duration is perpetual.

ARTICLE THREE

The purpose or purposes for which the corporation is organized is to transact any and all lawful business for which corporations may be incorporated under the Texas Business Corporation Act.

ARTICLE FOUR

The aggregate number of shares which the corporation shall have authority to issue is 1.000.000 shares with \$1.00 par.

ARTICLE FIVE

The corporation will not commence business until it has received for the issuance of its shares consideration of the value of not less than \$1,000.

ARTICLE SIX

The address of its registered office is 1005 St. Emanuel #206, Houston, Texas 77003 and the name of its registered agent at such address is Reiko Cho.

ARTICLE SEVEN

The number of initial directors are Two and the names and addresses of the directors are MOUI LUONG 15051 Wood Forest, Chennalview, Tx 77530 DANNY LUONG """

EXHIBIT

ARTICLE EIGHT

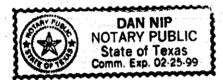
The name and address of the incorporator is Reiko Cho, 1005 Saint Emanuel #206, Houston, TEXAS 77003

Incorporator

Sworn to on August 04, 1998, by the above named incorporator.

Notery Public

County, Texas



Form 424 (Revised 01/06)

Return in duplicate to: Secretary of State P.O. Box 13697 Austin, TX 78711-3697 512 463-5555

FAX: 512/463-5709

Filing Fee: See instructions



Certificate of Amendment

This space reserved for office use.

In the Office of the Secretary of State of Texas

JUN 132007

Corporations Section

	Entity Information
The name of the filing entity is:	
LUONG'S CORPORATION	
State the name of the entity as currently show of the entity, state the old name and not the n	on in the records of the secretary of state. If the amendment changes the name ew name.
The filing entity is a: (Select the appropriat	te entity type below.)
☑ For-profit Corporation	☐ Professional Corporation
☐ Nonprofit Corporation	☐ Professional Limited Liability Company
☐ Cooperative Association	☐ Professional Association
☐ Limited Liability Company	☐ Limited Partnership
The file number issued to the filing en	ntity by the secretary of state is: 150060700
The date of formation of the entity is:	AUGUST 6, 1998
	Amendments
•	
The name of the fining entity is, (state	the new hame of the entity below)

The name of the entity must contain an organizational designation or accepted abbreviation of such term, as applicable.

2. Amended Registered Agent/Registered Office

The amendment changes the certificate of formation to change the article or provision stating the name of the registered agent and the registered office address of the filing entity. The article or provision is amended to read as follows:

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Form 424

JUN 13 2007

6

Secretary of State

Registered Agent (Complete either A or B. but not both. Also complete C.)

✓ A. The registered agent is an organization	(cannot be entity named above)	by the name of:
INVESTOR SUPPORT SERVICES, LLC		
OR		
☐ B. The registered agent is an individual re	esident of the state whose	name is:
First Name M.I.	Last Name	Suffix
C. The business address of the registered ager	nt and the registered office	e address is:
5855 SOVEREIGN DRIVE STE D151	HOUSTON	TX 77036
Street Address (No P.O. Box)	City	State Zip Code
3. Other Added, A	ltered, or Deleted Provis	sions
Other changes or additions to the certificate of formatic is insufficient, incorporate the additional text by provid form for further information on format. Text Area (The attached addendum, if any, is incorporated here	on may be made in the space p ling an attachment to this form	rovided below. If the space provided
✓ Add each of the following provisions to the reference of the added provision and the full to ARTICLE SEVEN - DIRECTORS: NAME A JESSIE LUONG PO BOX 231902, HO	ext are as follows: AND ADDRESS	The identification or
Alter each of the following provisions of the reference of the altered provision and the full		
Delete each of the provisions identified bel	ow from the certificate of	formation.
ARTICLE SEVEN - DIRECTORS: NAME A	AND ADDRESS	
DANNY LUONG 15051 WOOD FORE	EST, CHANNELVIEW T	X, 77530
Stateme	ent of Approval	

The amendments to the certificate of formation have been approved in the manner required by the Texas Business Organizations Code and by the governing documents of the entity.

Form 424 7

Effectiveness of Filing (Select either A, B, or C.)
 A. ✓ This document becomes effective when the document is filed by the secretary of state. B. ☐ This document becomes effective at a later date, which is not more than ninety (90) days from the date of signing. The delayed effective date is:
C. This document takes effect upon the occurrence of a future event or fact, other than the passage of time. The 90 th day after the date of signing is:
The following event or fact will cause the document to take effect in the manner described below:
The undersigned signs this document subject to the penalties imposed by law for the submission of a materially false or fraudulent instrument.
Date: JUNE 6,2007 Mongrum DIRECTOR / PRESIDENT
DIRECTOR / PRESIDENT
Signature and title of authorized person(s) (see instructions)

Form 424 (Revised 12/09)

Submit in duplicate to: Secretary of State PO. Box 13697 Austm, TX 78711-3697 512 463-5555 FAX 512/463-5709 Filing Fee: See instructions



Certificate of Amendment

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APR 072010

Corporations Section

Entity Information

The name of the filing entity is: LUONG'S CORPORATION State the name of the entity as currently shown in the records of the secretary of state. If the amendment changes the name of the entity, state the old name and not the new name. The filing entity is a: (Select the appropriate entity type below) For-profit Corporation " Professional Corporation ■ Nonprofit Corporation Professional Limited Liability Company Cooperative Association Professional Association Limited Liability Company Limited Partnership The file number issued to the filing entity by the secretary of state is: 150060700 The date of formation of the entity is: AUGUST 6, 1998 **Amendments** 1. Amended Name (If the purpose of the certificate of amendment is to change the name of the entity, use the following statement) The amendment changes the certificate of formation to change the article or provision that names the filing entity The article or provision is amended to read as follows:

The name of the entity must contain an organizational designation or accepted abbreviation of such term, as applicable

The name of the filing entity is: (state the new name of the entity below)

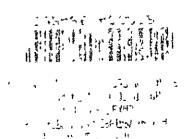
2. Amended Registered Agent/Registered Office

The amendment changes the certificate of formation to change the article or provision stating the name of the registered agent and the registered office address of the filing entity. The article or provision is amended to read as follows:

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APR 0.7 2010

Secretary of State



Registered Agent (Complete either A or B, but not both. Also complete C) A The registered agent is an organization (cannot be entity named above) by the name of OR B The registered agent is an individual resident of the state whose name is. First Name Last Name Suffix The person executing this instrument affirms that the person designated as the new registered agent has consented to serve as registered agent C The business address of the registered agent and the registered office address is TX Street Address (No P O Box) City State Zıp Code 3. Other Added, Altered, or Deleted Provisions Other changes or additions to the certificate of formation may be made in the space provided below. If the space provided is insufficient, incorporate the additional text by providing an attachment to this form. Please read the instructions to this form for further information on format Text Area (The attached addendum, if any, is incorporated herein by reference) Add each of the following provisions to the certificate of formation. The identification or reference of the added provision and the full text are as follows: Alter each of the following provisions of the certificate of formation. The identification or reference of the altered provision and the full text of the provision as amended are as follows: **Delete** each of the provisions identified below from the certificate of formation. ARTICLE SEVEN (AS PREVIOUSLY AMENDED ON JUNE 13, 2007) - DIRECTORS NAME AND **ADDRESS**

Statement of Approval

The amendments to the certificate of formation have been approved in the manner required by the Texas Business Organizations Code and by the governing documents of the entity.

PO BOX 231902, HOUSTON TX 77223

Form 424

JESSIE LUONG

Effectiveness of Filing (Select either A, B, or C)

A This document becomes effective when the do	cument is filed by the secretary of state
B This document becomes effective at a later dat	e, which is not more than ninety (90) days from
the date of signing. The delayed effective date is:	
C. This document takes effect upon the occurrence passage of time. The 90 th day after the date of signing	
The following event or fact will cause the document	to take effect in the manner described below
Execu	tion
The undersigned signs this document subject to the materially false or fraudulent instrument and certificauthorized under the provisions of law governing the	s under penalty of perjury that the undersigned is
Date 4/4/2010 By:	duonn.
Signal	Aresi dent ture of authorized person
D. D	MUUI LUONG d or typed name of authorized person (see instructions)

Form 503 (Revised 08/19)

Return in duplicate to: Secretary of State P.O. Box 13697 Austin, TX 78711-3697 512 463-5555

FAX: 512 463-5709

Filing Fee: \$25



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FILED
In the Office of the
Secretary of State of Texas

DEC 30 2021

Corporations Section

	Assun	ned Name	
1. The assumed name under whi	ch the business	or professional service	ce is, or is to be, conducted or
rendered is: Three R Center			<u> </u>
	Entity I	nformation	
2. The legal name of the entity fi	ling the assume	d name is:	
Luong's Corporation			
State the name of the entity as currently if not filed with the secretary of state.	shown in the recor	ds of the secretary of sta	te or on its organizational documents,
3. The entity filing the assumed	name is a: (Select	the appropriate entity type	below.)
✓.For-profit Corporation		Limited L	iability Company
	Limited Partnership		
Professional Corporation		Limited L	iability Partnership
Professional Association	Cooperative Association		
Other			
Specify type of entity. For	example, foreign.re	eal estate investment trus	t, state bank, insurance company, etc.
4. The file number, if any, issued	I to the entity by	the secretary of stat	e is: 150060700
5. The state, country, or other ju	risdiction of for	nation of the entity i	s: Texas
6. The entity's principal office a	ddress is:		
15055 Woodforest Blvd.			
Street or Mailing Address			
Channelview	TX	USA	77530
City	State	Country	Postal or Zip Code
	Period:	of Duration	
7a. The period during which with the secretary of state. OR			
7b. The period during which with the secretary of state (not to		•	years from the date of filing
OR	·	•	The state of the s
7c. The assumed name will	be used:until		(not to exceed 10 years).
		mm/dd/yyyy	

Form 503

County or Counties in which Assumed Name Used

8. The county or counties where business or professional services are being or are to be conducted or rendered under the assumed name are:
All counties
All counties with the exception of the following counties:
✓ Only the following counties: Montgomery
Execution
The undersigned signs this document subject to the penalties imposed by law for the submission of a materially false or fraudulent instrument and also certifies that the person is authorized to sign on behalf of the identified entity. If the undersigned is acting in the capacity of an attorney in fact for the entity, the undersigned certifies that the entity has duly authorized the undersigned in writing to execute this document.
Date: December 27, 2021
Danny Luong Danny Luong, Vice President

Signature of a person authorized by law to sign on behalf of the identified entity (see instructions)

