## AFFIDAVIT OF XIAOQIANG CHEN

STATE OF NEVADA ) ) ss: COUNTY OF CLARK )

Before me, the undersigned authority, personally appeared Xiaoqiang Chen who is known to me or who showed proper identification, and after being first duly sworn according to law, upon his oath, deposed and said:

- 1. My name is Xiaoqiang Chen (aka. Andy Chen). I am over 18 years of age, am of sound mind, and am fully competent to make this Affidavit. All of the facts stated herein are based upon my personal knowledge and are true and correct, to the best of my recollection.
- 2. I have been the manager for Massage Well located at 5300 W. Sahara Avenue, Unit 203. Las Vegas, NV 89146 since its opening on April 9<sup>th</sup>, 2016.
- 3. On Nov 12<sup>th</sup>, 2024 around 10:00 am, a patron Rebecca White entered Massage Well for a massage. As usual, she marked the diagram chart provided by Massage Well to show which areas of her body had pain and needed to be massaged (**Please See Attached Ms. White's Diagram Chart**) so that the massage therapist could follow the chart to give her a massage.
- 4. Ms. White asked for a 2-hour massage but didn't request a specific massage therapist to work on her. Therefore, Jiabin Si (aka. Mike) was assigned to massage her because it was Mike's turn at that moment. Mike guided Ms. White to a massage room around 10:05 am.
- 5. Two hours later, Ms. White came out of the massage room and walked straight to me at the front desk to make the payment. Routinely, I asked Ms. White: "How was your experience?". Ms. White replied: "It was good" then paid \$160 for the 2-hour massage session and \$40 cash for Mike's tip. Since everything went on so naturally and smoothly and there was no single sign of anger, dissatisfaction or uncomfortableness from Ms. White, I asked Ms. White: "Would you like to become a member with us?". Ms. White responded: "Yes" then paid \$10 for the membership fee. With Ms. White's help, I immediately typed her personal information into Massage Well membership's computer system before handing her a member card. About 30 minutes later, as our regular procedure, I sent Ms. White a text message simply asking: "How was your experience? Please leave a review on Google and you will get 15% off for your next visit". About 10 minutes later, Ms. White called me and complained: "I came here a few times but this time is the worst. I don't like Mike. Jerry massaged me before and every one all worked good". I asked: "What happened?". Ms. White responded: "He massaged my butt too long. Anyway, I will report him but I'll be back". I replied: "I will check what happened and I will fire him immediately if it will be the truth". Ms. White said: "I don't mind".

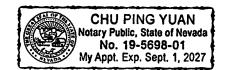
- 6. I talked to Mike about the situation. Mike responded that he had been massaging Ms. White based on her chart. Since Ms. White marked the pain on her buttocks, Mike spent around 15 minutes to work on these areas as shown on her chart. During his massage, the only conversation between him and Ms. White was that Ms. White asked Mike not to massage too hard. Mike immediately followed her instructions and he received no more complaints from Ms. White for the rest of the session.
- 7. Mike has been working for Massage Well since May 2024 as a licensed massage therapist. He has always been a good massage therapist and has received multiple 5-star reviews from female clients (**Please see attached Part of Mike's Google Reviews**).
- 8. After this incident, the police came to Massage Well three times. To avoid any potential problems, I asked Mike to temporarily stay at home. When the police came to Massage Well the second time, one of the officers asked me where Mike was. I told the officer that I asked Mike to go home. The officer said if you don't think Mike did anything wrong, why did you send him away. I then asked Mike to come back to work until Mike received a Cease and Desist Letter from the Nevada State Board of Massage Therapist around December 23, 2024.
- Massage Well as well as its massage therapists have never been charged, indicted or convicted with any crimes since its opening in 2016. And there have been no prior complaints ever filed against Mike or Jiabin Si since he started working in Massage Well in May 2024.
- 10. My native language is Chinese. Although I am proficient in the English language to a certain degree, I am not fully bilingual. I have read my Affidavit above and discussed any questions I had regarding the English in the Affidavit with a bilingual speaker of English and Chinese, and based upon my personal knowledge, I hereby attest to the truth of all of the facts asserted in my Affidavit@.

FURTHER AFFIANT SAYETH NAUGHT.

Affiant: XHAOQIANG CHEN

SUBSCRIBED and SWORN to before me this 10+11 day of 100/04, 2025.

of said State and County



CHU PING YUAN Notary Public, State of Nevada No. 19-5698-01 My Appl. 5-5, Sapt. 1, 2027