

FILED  
CLERK, U.S. DISTRICT COURT  
5/22/18  
CENTRAL DISTRICT OF CALIFORNIA  
BY: **CS** DEPUTY

1 DAVID J. VAN HAVERMAAT (Cal. Bar No. 175761)  
Email: vanhavermaatd@sec.gov  
2 DAVID S. BROWN (Cal. Bar No. 134569)  
Email: browndav@sec.gov

3 Attorneys for Plaintiff  
4 Securities and Exchange Commission

5 Joseph G. Sansone, Unit Chief (Market Abuse Unit)  
New York Regional Office  
6 200 Vesey Street, Suite 400  
New York, New York 10281

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BY: **CS** DEPUTY

7 Robert A. Cohen, Unit Chief (Cyber Unit)  
8 Headquarters  
100 F Street, N.E.  
9 Washington, District of Columbia 20549

10 Michele Wein Layne, Regional Director  
Amy Jane Longo, Regional Trial Counsel  
11 444 S. Flower Street, Suite 900  
Los Angeles, California 90071  
12 Telephone: (323) 965-3998  
Facsimile: (213) 443-1904

13  
14 **UNITED STATES DISTRICT COURT**  
15 **CENTRAL DISTRICT OF CALIFORNIA**  
16 **WESTERN DIVISION**

17 **SECURITIES AND EXCHANGE**  
18 **COMMISSION,**

19 **Plaintiff,**

20 **vs.**

21 **TITANIUM BLOCKCHAIN**  
22 **INFRASTRUCTURE SERVICES,**  
23 **INC.; EHI INTERNETWORK AND**  
24 **SYSTEMS MANAGEMENT, INC.**  
25 **aka EHI-INSM, INC.; and MICHAEL**  
26 **ALAN STOLLERY aka MICHAEL**  
27 **STOLLAIRE,**

28 **Defendants.**

Case No. **CV18-4315-DSF(JPRx)**  
**DECLARATION OF JOEL S.**  
**UNRUCH**

1 **DECLARATION OF JOEL S. UNRUCH**

2 I, Joel S. Unruch, declare, pursuant to 28 U.S.C. § 1746, as follows:

3 1. I am an attorney in the Legal Group of Accenture. I am over 21 years of  
4 age. I have either personal knowledge of the facts set forth herein or have knowledge  
5 of the facts set forth herein based on information and belief.

6 2. Accenture is a leading global professional services company, providing a  
7 broad range of services and solutions in strategy, consulting, digital, technology and  
8 operations.

9 3. On February 9, 2018, Accenture (also referred to herein as the company)  
10 received an information request from the staff of the U.S. Securities and Exchange  
11 Commission ("SEC"). The request asked Accenture whether the company has, or has  
12 had, a business relationship with Titanium Blockchain Infrastructure Service, Inc.  
13 ("TBIS"), EHI Internetwork and Systems Management ("EHI"), or Michael Stollaire  
14 aka Michael Stollery or Michael Stoller ("Stollaire").

15 4. I directed persons at Accenture to search the company's internal  
16 accounts payable and receivable databases. These persons reported that they  
17 conducted such a search and did not identify records of payments to or from  
18 Accenture by TBIS, EHI, or Stollaire.

19 5. I further directed the managers of several relevant teams within  
20 Accenture (including leaders of Accenture's Blockchain subject matter experts team)  
21 to inquire of their personnel whether they were familiar with TBIS, EHI or Stollaire.  
22 These managers reported that they had no knowledge of any relationship between  
23 Accenture and TBIS, EHI or Stollaire.

24 6. I further directed members of the team within Accenture responsible for  
25 approving third party uses of the Accenture name, including trademarks and logos, to  
26 inquire of their personnel whether they were familiar with TBIS, EHI or Stollaire,  
27 including any requests to use the Accenture name or disclose the existence of a  
28

1 business relationship. These persons had no knowledge of any authorization given to  
2 TBIS, EHI or Stollaire to use the Accenture name, trademark or logos.

3 7. I further directed persons at Accenture to search the company's internal  
4 database of independent contractors. This review determined that, on two occasions  
5 between 2016 through 2017, Stollaire was hired as a temporary contractor through a  
6 staffing agency to provide information technology services to Accenture clients.  
7 Accenture's database indicates that on or about April 21, 2016 and October 28, 2016,  
8 Accenture uploaded a copy of Stollaire's resume received from the third party  
9 staffing agency, a true and correct copy of which is attached hereto as Exhibit 1.

10 8. According to Accenture's internal contractor database, between  
11 approximately April 27, 2016 and November 30, 2016, Stollaire, through a third party  
12 staffing agency, acted as a temporary technical architecture contractor for an  
13 Accenture client; and that between approximately October 1, 2016 and July 31, 2017,  
14 Stollaire, through a third party staffing agency, acted as a temporary technical  
15 architecture contractor for a different Accenture client.

16 I declare under penalty of perjury under the laws of the United States of  
17 America that the foregoing is true and correct.

18 Executed this 20<sup>th</sup> day of March, 2018, in Chicago, Illinois.

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21 Joel S. Unruch  
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# **EXHIBIT 1**



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<b>Michael Stollaire</b>	<b>HP BSM/Site Scope SME</b>
<b>Summary</b>	
<ul style="list-style-type: none"> <li>• When it comes to HP/Open View (a.k.a., BSM), BMC Patrol/Proactive Net/BPPM, IBM Tivoli/Netcool, EMC SMARTS, Cisco Works, SCOM, etc.</li> <li>• I have no equal, when it comes down to expertise and clientele. Your investment in my services will have an immediate positive impact on the bottom line and ROI, as I can accomplish twice as much in half the time as anyone else.</li> <li>• In short, I eliminate chaos.</li> </ul>	
<b>Experience:</b>	
<b>GE/Synchrony Financial: HP Tools Infrastructure Lead/HP BSM v.9.26</b>	<b>January 2015 – Present</b>
<ul style="list-style-type: none"> <li>• HP Operations Analytics v.10.x</li> <li>• HP Operations Bridge (a.k.a., OMi) v.10.x</li> <li>• HP OMW/OMU v.9.x</li> <li>• HP NMC (NNMi/NA/PerfSPI) v.10.x</li> <li>• HP SiteScope v.11.3x</li> <li>• HP BPM 9.26</li> <li>• HP VuGen/TruClient 12.50</li> <li>• HP SHR v.9.x</li> <li>• Splunk</li> <li>• TelAlert</li> <li>• ServiceNow Ticketing System</li> </ul>	
<b>SCOPE OF WORK:</b>	
<ul style="list-style-type: none"> <li>• Over 30,000 servers and thousands of network devices.</li> <li>• Main efforts were to migrate all existing monitoring solutions from the GE infrastructure to the newly spun-off Synchrony Financial infrastructure.</li> <li>• This also involved replacement, consolidation and integration of the following legacy solutions:</li> <li>• EM7, CA Wily, GOMEZ, TOPAZ, BAC, CA Spectrum, HP SiteSeer, Mercury SiteScope, HP Performance Manager, HP Reporter, vFoglight, OpsWare, HP Server Automation, CA eHealth, CA AutoSys, HP OVPI, SolarWinds, CVMon, Riverbed, Cisco Security Manager, Nagios, UniSphere, vCOPS, CA Patch Automation, CA ITPAM, etc.</li> </ul>	
<b>HP Enterprise Services (Consultant): HP BSM SME for HP Enterprise Services, HP Helion Cloud for Private and Public Sector Clients</b>	<b>January 2015 – Present</b>
<ul style="list-style-type: none"> <li>• Agile Training ~ SCRUM ~ Two-Week Sprint Methodology</li> <li>• HP Agile Manager v.2.32, Build 504</li> <li>• HP Application Lifecycle Management (ALM) v.12.01.2 (Patch1)</li> <li>• HP BSM v.9.25</li> <li>• HP OMi v.10.x</li> <li>• HP OMW v.9.x</li> <li>• HP SiteScope v.11.3x</li> <li>• IT Business Analytics (ITBA) v.10</li> <li>• Integrations with: HP Service Manager, Service Now, HP OM, NNMi, SiteScope, Service Health</li> </ul>	

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- Reporter (SHR), BPM, Server Automation (SA), Performance Manager, APM 360, etc.
- Customized and Extensive work with: HP NA v.10.x, OMI v.10.x, Cloud Service Automation (CSA) v.4.1x, etc.
- Serving HP Internally and External Clients: NASA, USPS, IRS, FAA, etc.
- Authored Automation Layer and Deployment Guide for HP's Managed Private Cloud offering, including the HP OM, OO, SA, CSA, etc. solutions, for Private and Public Sector clients, globally.

**IBM**

**September 2014 – October 2015**

**Global software implementation for IBM Enterprise Management.**

- IBM/Tivoli/Netcool v7.4x
- IBM Tivoli Directory Integrator (TDI) v.7.1.1: Integrations with Prominent Ticketing Systems: ServiceNow, Maximo, Service Manager, Remedy, IBM Integrated Service Manager (ISM), etc.
- Serving IBM Internally and External Clients: Goldman Sachs, Sysco, **Wellpoint/Anthem**, Kaiser Permanente, **Baxter Pharmaceuticals**, Citi, Dow Jones, Honda, BG Group, Ameriprise, Baker Hughes, CalCloud, CNA Insurance, CokeOne, DuPont NextGen, Hess, Jones Lang LaSalle (JLL), Macy's, NiSource, Pearson, The State of Georgia, Xcel Energy, etc.

**Cargill**

**June 2014 – September 15, 2014**

**HP OM and Microsoft SCOM 2012 R2 SME, server farm numbers in the thousands.**

- Cargill is the largest privately owned company in the world. Transitioned Enterprise Management services from Cargill to TCS (Outsourcing Company).
- HP Operations Manager v.8.x and 9.1x
- Microsoft SCOM 2012 R2
- TelAlert Advanced MIR3 Unified Notifications System v.5.1x and 6e v.6.3

**J9 Technologies (HP Platinum Partner):**

**January 2014 – Current**

**HP BSM/SHA and SHR SME**

- HP Service Health Reporter (SHR) v.9.2 and v.9.3
- HP Business Service Management (BSM) v.9.23

**Boeing:**

**June 2013 – June 2014**

**Performance and Capacity Planning Subject Matter Expert (SME)**

- Responsible for upgrading HP Service Health Reporter (SHR) v.9.2 to v.9.3, performance tuning, hot fix applications, integrations with HP iSPI for Performance Metrics (NPS), NNMI, BSM, OM, SiteScope, etc. Also, assisted Boeing personnel with day-to-day operations, patching, upgrades, development, etc. on all aforementioned tools.
- HP Service Health Reporter (SHR) v.9.2 and v.9.3

**Microsoft:**

**January 2013 – December 2014**

**Network Management Subject Matter Expert (SME)**

- Responsible for upgrading HP Network Node Manager (NNMi) v.9.1 to v.9.22, standing up a redundant, failover, follow-the-sun NNM Competency Center paradigm in all global Microsoft NOCs, along with integration into HP Service Manager ticketing, xMatters notifications (formerly Invoq AlarmPoint), etc.
- HP Network Node Manager (NNMi) v.9.22
- HP NNMI iSPI for Performance (NPS) v.9.1
- HP Network Automation (HPNA) v.9.21
- Microsoft SCOM 2012 R2



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**HP Information Technology (HP IT):**

**January 2013 – June 2013**

**Senior Enterprise Management Architect for Six (6) Mega-NOCs and BSM SME**

- Responsible for Upgrade and Integration of
- HP Operations Manager on Windows (OMW) v.9
- HP Operations Manager on Linux (OML) v.9.1
- HP SiteScope (SiS) v.11.2
- HP Network Node Manager (NNMi) v.9.2i
- HP Business Service Management (BSM) and BPM v.9.21
- HP Quality Center v.9 ~ Extensive Development and QA Testing
- HP Universal CMDB (uCMDB) v.9.05 ~ Over Three Million Configuration Items (CIs)
- HP Operations Manager Agent (OMA) v.11.10
- HP Discovery & Dependency Mapping Inventory (DDMa/DDMi) v.9.32

**The Federal Reserve Bank (FRB):**

**December 2010 – December 2014**

**Monitoring Team Leader, Implementation and integration-**

- EMC SMARTS v.8.x/v.9.x
- BMC Patrol/ProactiveNet v.3.6/v.3.7 and v.9.x
- Qwest Big Brother v.5.01
- ITIL v.3 Certification Training
- Tripwire Enterprise v.7.x
- HP Operations Manager on Windows (OMW) v.9
- HP Network Node Manager (NNMi) v.9.2i
- HP Business Service Management (BSM) v.9.23
- HP Service Health Analyzer (SHA) v.9.2
- HP Systems Insight Manager (SIM) v.7.1
- HP Application Performance Management (APM) 360 v.9.21
- HP Operations Manager Agent (OMA) v.11.11
- HP Operations Orchestration (OO) v.9.06
- HP Universal CMDB (uCMDB) v.10.01
- HP uCMDB Browser v.2.x
- HP Discovery & Dependency Mapping Inventory (DDMa/DDMi) v.9.32

**Honeywell International**

**July 2010 – December 2012**

**Implementation and integration of:**

- HP Business Service Management (BSM) v.9.21
- HP Operations Manager OMW v.9/OML v.9.1
- HP Network Node Manager (NNMi) v.9.2
- HP Systems Insight Manager (SIM) v.7.1
- HP Performance Manager (OVPM) v.9.02
- HP Operations Manager Agent (OMA) v.11.10
- Service Health Reporter (SHR) v.9.2
- HP SiteScope (SiS) v.11.20
- Microsoft SCOM 2012
- SNMP v1/2c/3, etc.
- Global enterprise management, including managed nodes such as the following: Cisco LAN Catalyst switches, Cisco MDS 9513 SAN fiber switches, Cisco routers, Cisco routing-switches, Cisco WAAS, Cisco UCS, Veritas NetBackup, Hitachi Device Manager and Replication Manager, IBM TSM, IBM



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ITIM, Veraz Media Gateway, Oracle and MS SQL relational databases, deployment of HP OM SPIs and creation of custom HP OM SPIs and policies

**Zag.com/True Car:**

**March 2010 – December 2010**

**Implementation of HP/Mercury SiteScope v.9.x – v.11.x, HP/Open View NNM, Operations Manager**

- Performance Manager, Reporter, Nagios installation and integration, subsequent notifications, and tie in to Confluence/Jira help desk incident platform, etc.
- Also was involved in administration and maintenance of RadWare load balancers/SSL Accelerators, CheckPoint Firewall, EMC SAN, etc. Sub-Clients: USAA, eBay, American Express, Consumer Reports, Overstock.com, Capital One, The Hartford, Liberty Mutual, etc.

**SOLUTIONS IMPLEMENTED**

- HP/OpenView Operations Manager: v.8.16 and upgraded to v.9.x
- HP/OpenView Network Node Manager: v.8i and upgraded to v.9i
- HP/OpenView Performance Manager: v.8 and upgraded to v.8.20
- HP/OpenView Performance Insight: v.5.5
- HP/OpenView Performance Agent Technology (Linux/Windows) v.5.x
- HP/OpenView Reporter v.3.80
- Nagios v.3.2.3 Integration Points with HP/OpenView
- CheckPoint Firewall and VPN (N-Class) Management and Monitoring
- RadWare SSL Accelerators and Load Balancer Management and Monitoring
- VMware vCenter: v.3.x and upgraded to v.4.x
- EMC SAN: Clariions and Navisphere Management and Monitoring
- Dell SAN: Modular Power Vault Management and Monitoring
- Microsoft SQL Server 2005/2008: Management and Monitoring
- Symantec BackupExec: Upgrade from v.10.x to 2010 R2, including three-COLO Disaster Recovery Architecture
- Microsoft Exchange: Administration and Technical Lead on Exchange 2003-2010 Migration
- Linux: Red Hat Enterprise Server v.4.x/v.5.x migration to CentOS ~ overall Systems Administration
- Windows: Server 2003 (x86/x64) migration to Windows Server 2008 R2 64-bit and Active Directory/DNS Management

**eBay:**

**March 2009 – March 2010**

- Implementation of NerveCenter systems, migration from v.4.1.02 to v.4.1.03 to v.5.1.01 and re-architecture with multi-thread poller, development and design of event correlation behavioral models, polls, SNMP trap masks, etc., development of technical training plan, project plan development, technical documentation, reviewing new technical requirements for Service Level Management, integration of Tivoli/NetView, Tivoli/TEC and upgrade to Tivoli/Netcool; and, providing technical support, for day-to-day administration of the enterprise management framework implemented at eBay, including Mercury SiteScope/BAC. Also architected and implemented SQL and Netezza TwinFin Database Appliance framework.

**Citizens Bank:**

**October 2008 – October 2009**

- CA Wily Introscope, IBM/Tivoli Netcool ~ OMNIbus v.3.6x, v.7.x (upgrade), ISMs, SSM, Mercury SiteScope, Integration points to HP/BTO Service Manager 7, Legato NetWorker, EMC SAN, HDS SAN, VMware virtualization management, rules file development for hardware, F5 Big IP load balancers, Dell, HP, BASP, IronMail, generic SNMP probe, syslog probe, process monitors, etc.
- TelAlert was used for notifications. NetIQ v.6.x, NerveCenter v.4.x were also used for Windows Server management and event correlation/root-cause analysis, respectfully.





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- The NetIQ implementation involved integration of the Application Manager Suite with Netcool/OMNIBus, system and application performance monitoring, assessment of management tools and recommending best practice solutions, technical requirements gathering, and delivery of best-of-breed solutions based on these recommendations.
- Also architected and implemented SQL and Netezza TwinFin Database Appliance framework.

**Axciom:**

**October 2008 – March 2009**

- HP/OpenView Operations (OMU) v.8.x, Network Node Manager v.7.53x and v.8i, Performance Manager v.6.x, Service Desk v.4.5x and Service Manager v.7.x, Internet Services v.6.x, Reporter v.3.8x, Performance Insight v.5.1, etc.
- Developed custom SNMP event management via NNM and used OVO's API opcmgs, to integrate custom applications.
- Developed integration from OMU to HP/OpenView Service Manager v.7.x

**Kindred Healthcare:**

**March 2008 – November 2008**

- HP/OpenView Operations (OVOW) v.7.5x and v.8.x, Network Node Manager V.7.53x and v.8i, Performance Manager V.6.x, Service Desk v.4.5x and v.5.x ~ upgraded to Service Manager V.7, Internet Services v.6.x (Upgraded to Mercury SiteScope/Topaz/BAC), Reporter v.3.5x, Performance Insight v.5.x, etc.
- Developed custom SNMP event management via NNM and used OVO's API opcmgs, to integrate custom applications.

**ERCOT:**

**June – October 2007**

- Implemented NNM v.6.x – 7.x installation and upgrade, along with integration into the HP/OpenView enterprise management framework, including HP/OMW 7.x, customizing events and policies.

**Bank of Scotland in Ireland:**

**January 2007 – March 2008**

- HP/OpenView Operations (OVOW) v.7.5x and v.8.x, Network Node Manager v.7.53x and v.8i, Performance Manager v.6.x, OpenView Service Center v.6.x (also upgraded to Service Manager v.7.x), Internet Services v.6.x, Reporter v.3.5x, Performance Insight v.5.x, Mercury SiteScope/Topaz/BAC, etc.

**Pacific Capital Bancorp:**

**July 2005 – July 2007**

- HP/OpenView Operations (OVOW) v.7.21x, Network Node Manager v.7.5x, Performance Manager v.5.x, Service Desk v.4.5x/Service Manager, Internet Services v.5.2x, Reporter v.3.5x, Performance Insight v.5.x, Radia v.4.1, Invoq AlarmPoint v.6.1.1, etc.

**Walt Disney Studios:**

**August 2004 – July 2005**

- HP/OpenView Operations (OVOW) v.7.x/v.8.x, Network Node Manager, v.6.x/v.7.x, Service Reporter v.3.5x, BMC Patrol – Enterprise Manager v. 4.3.01x, Peregrine/HP ServiceCenter, v.6.x and Service Manager v.7, etc.

**Honeywell Labs:**

**April 2004 – March 2005**

- HP/OpenView Network Node Manager v.7.x and HP/OpenView Operations (OVOW) v.7.x/v.8.x, CiscoWorks 2000 – Device Fault Manager v.1.2x, Mercury SiteScope, IBM/Tivoli – NetView v.7.1.4x, Micromuse Netcool/OMNIBus v.7.x, Impact v.3.x; and, Precision v.3.5.1x; NetIQ v.6.x, NerveCenter v.4.x, SMARTS In-Charge v.6.x, etc.

**County of Los Angeles:**

**April 2002 – April 2004**

- HP/OpenView Operations (OVO) v.7.x, Network Node Manager (NNM) v.6.41 (Production) and v.7.x



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(Development) - Distributed environment, included two (2) Management Stations (MSs) and five (5) Collection Stations (CSs); Extended Topology v.2.x; HP/OpenView Reporter v.3.5x (Development); HP/OpenView Internet Services v.5.x (Development); Firehunter (a.k.a., Indicative Service Director) v.5.x; Micromuse Netcool v.3.5/v.3.6, CiscoWorks 2000 - Routed WAN (RWAN) and LAN Management Solutions, Campus Manager, etc.; CiscoSecure ACS v.2.6; Concord eHealth v.5.x; NetScout nGenius Real-Time Monitor v.1.x and Performance Manager v.2.x; Vyte Wireless TelAlert Unified Messaging System (UMS) v.5.5; MRTG v.2.10.13; Tavve Toolkit+ v.2.2 for OpenView and NetView, SMARTS In-Charge v.6.x, etc.

**Universal Studios:**

**October 2001 – April 2002**

- HP/OpenView Network Node Manager (NNM) v.6.41 - Distributed environment, included two (2) Management Stations (MSs) and five (5) Collection Stations (CSs); Extended Topology v.2.x; Firehunter (a.k.a., Indicative Service Director) v.5.x (Development); CiscoWorks 2000 - Routed WAN (RWAN) and LAN Management Solutions, Campus Manager, etc.; Concord eHealth v.5.x; Vyte Wireless TelAlert Unified Messaging System (UMS) v.5.5, etc.

**Applied Materials:**

**June 2001 – October 2001**

- HP/OpenView Operations (OVO) v.6.x/v.7.x, Network Node Manager (NNM) v.6.x - Distributed environment, included two (2) Management Stations (MSs) and three (3) Collection Stations (CSs); HP/OpenView Reporter v.3.x, HP/OpenView Internet Services v.4.x, Vyte Wireless TelAlert Unified Messaging System (UMS) v.5.5, etc.

**Education:**

**Syracuse University**

- B.Sc. in Clinical Psychology - High Honors- August 1989