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

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4 Securities and Exchange Commission

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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**
STOLLAIRE,
27 **Defendants.**

Case No. **CV18-4315-DSF(JPRx)**
DECLARATION OF BETH A. SASFAI

27
28

1 **DECLARATION OF BETH A. SASFAI**

2 I, Beth A. Sasfai, declare, pursuant to 28 U.S.C. § 1746, as follows:

3 1. I am employed by Verizon Corporate Resources Group LLC. My
4 position in the company is Vice President and Associate General Counsel, Corporate
5 Governance. In this capacity, I have personal knowledge of the matters set forth
6 below and, if called as a witness, would testify to these facts under oath.

7 2. I make this declaration at the request of the United States Securities and
8 Exchange Commission (“SEC”).

9 3. Verizon Communications Inc. is a holding company that, acting through
10 its subsidiaries (“Verizon”), is one of the world’s leading providers of
11 communications, information and entertainment products and services to consumers,
12 businesses and governmental agencies.

13 4. On or about February 9, 2018, the SEC requested that Verizon provide it
14 with certain information concerning companies called Titanium Blockchain
15 Infrastructure Services, Inc. (“TBIS”) and EHI Internetwork and Systems
16 Management, Inc. (“EHI”), and an individual named Michael Stollaire aka Michael
17 Stollery or Michael Stoller (“Stollaire”).

18 5. In my capacity as the Vice President and Associate General Counsel,
19 Corporate Governance of Verizon, I am required, periodically and as needed, to
20 become familiar with the entities with which Verizon has contracts, agreements,
21 and/or other substantive business relationships including alliances and partnerships.
22 In addition, in my capacity as the Vice President and Associate General Counsel,
23 Corporate Governance of Verizon, I share responsibility with other members of the
24 Verizon’s legal department, intellectual property counsel, and others to protect
25 Verizon’s trade name, trademarks, and service marks from infringement and other
26 unauthorized uses by third parties. In response to the SEC’s request, and at my
27 direction, Verizon’s personnel reviewed the books, records, files, and computer
28 systems of the business units within Verizon that might reasonably be expected to

1 have or to have had any type of business relationship with TBIS or EHI or Stollaire
2 including as a customer, client, vendor, employee, contractor, consultant, or other
3 type of business transaction.

4 6. Verizon keeps and maintains business records in the course of its
5 transactions and regularly conducted activities as a regular practice. It is Verizon's
6 practice to prepare such records at or near the time of the occurrence of the matters
7 set forth by, or from information transmitted by, a person with knowledge of those
8 matters. Verizon maintains books and records of entities and persons with which it
9 has contracts, agreements, and/or other substantive business relationships, such as the
10 purchase and sale of a product or service, making an investment, or entering into an
11 alliance or partnership, including authorized uses by third parties of its trade name,
12 trademarks, and service marks. Verizon also maintains books and records of entities
13 and persons with which it has engaged as an employee, vendor, contractor, or
14 consultant. For the purposes of this declaration, as the Vice President and Associate
15 General Counsel, Corporate Governance of Verizon, I am the custodian of those
16 records or am otherwise qualified to testify about them.

17 7. Verizon's books and records are reasonably current as of the date of this
18 declaration. The search of these materials has not disclosed any current or past
19 business relationship of any kind between Verizon and TBIS or EHI or Stollaire.

20 8. The search of these materials has not disclosed that Verizon has ever
21 authorized TBIS or EHI or Stollaire to use Verizon's name or logo in their marketing
22 or advertising. The "Verizon" name and logo are the intellectual property of Verizon
23 Trademark Services LLC. Verizon considers a third-party's unauthorized use of the
24 "Verizon" name or logo in marketing or advertising as an infringement of its
25 intellectual property.

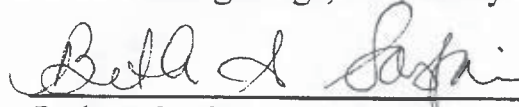
26 9. Verizon sent Titanium Blockchain Infrastructure Services Inc. a cease
27 and desist letter on March 2, 2018, a true and correct copy of which is attached hereto
28

1 as Exhibit 1. Verizon received a reply from Titanium on March 8, 2018, a true and
2 correct copy of which is attached hereto as Exhibit 2.

3 ///

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

6 Executed this 14th day of March, 2018 at Basking Ridge, New Jersey.

7 
8 _____
9 Beth A. Sasfai

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EXHIBIT 1



Patrick Flaherty
Managing Associate General
Counsel
Legal Department

1320 N. Courthouse Road
Floor 9
Arlington, VA 22201, U.S.A.
patrick.m.flaherty@verizon.com
T 703.351.3020

March 2, 2018

VIA FEDEX AND EMAIL (info@tbis.io)

Titanium Blockchain Infrastructure Services Inc.
Attn: Legal Department
15027 Dickens Street, Suite 4,
North Hollywood, CA, 91403, USA

Re: Unauthorized Use of VERIZON Logo

Dear Sir or Madam:

I am intellectual property counsel to Verizon Communications Inc. and its subsidiaries, including Verizon Trademark Services LLC ("VTS") (collectively "Verizon"). VTS is the owner of the famous, federally registered trademarks VERIZON and the VERIZON Logo, including U.S. Reg. No. 2,886,813 (the "VERIZON Marks").

Verizon recently learned that Titanium Blockchain Infrastructure Services Inc. ("Titanium") is using the VERIZON Logo without Verizon's permission or authorization on your company's website in the "About Us" section alongside various other third-party marks, located at <https://tbis.io/about-us/> (the "Website"). A screenshot of the Website evidencing such use of the VERIZON Logo is enclosed as Exhibit A.

Titanium's unauthorized use of the VERIZON Logo constitutes trademark and trade name infringement and unfair competition under federal, state and common law. Such use of the VERIZON Logo conveys the false and misleading impression that your company's products and services are sponsored or approved by Verizon or that your company is somehow affiliated with Verizon. Such infringing use violates Section 43(a) of the federal Lanham Act and also tarnishes Verizon's reputation and constitutes trademark dilution in violation of Section 43(c) of the Lanham Act. There is no justification for your company's use of the VERIZON Logo. Furthermore, Titanium's unauthorized use of the VERIZON Logo constitutes copyright infringement under federal law.

We therefore demand that Titanium: (1) immediately and permanently remove the VERIZON Logo from your company's Website and any other

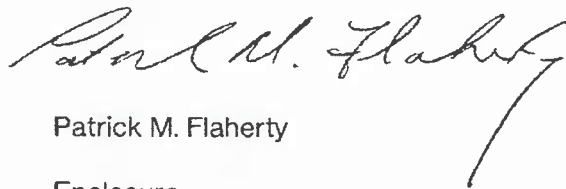
Titanium Blockchain Infrastructure Services Inc.
Attn: Legal Department
March 2, 2018
Page 2

marketing materials; and (2) permanently cease and refrain from all future use of the VERIZON Marks or any other mark or name confusingly similar thereto, whether as a trademark, trade name, or otherwise.

While Verizon has numerous legal options in this matter, it is willing to consider an amicable resolution; provided, however, that the above demands are met no later than **March 9, 2018**.

Nothing in this letter shall be deemed a waiver of any rights, remedies or defenses of Verizon, all of which are hereby expressly reserved under all applicable laws.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick M. Flaherty". The signature is written in a cursive style with a long, sweeping tail that extends downwards and to the right.

Patrick M. Flaherty

Enclosure

3/2/2018

About Us - Titanium Blockchain Infrastructure Services | TBIS



Today, the largest transportation company in the world owns no cars (Uber), the largest hospitality company on the face of the planet owns no hotels (AirBnB), the largest retailer carries no stock (Alibaba), and the world's most popular media network creates no content (Facebook). Clearly, we are living in a time of radical change. Why should internet infrastructure be any different?

The EHI Advantage

Unlike 99.99% of Blockchain start-ups and Initial Coin Offerings (ICOs), the Titanium Core Team is not composed of relative newcomers to technology. In stark contrast, the Titanium Core Team has over two-hundred (200) years of combined experience. This is also not the first technology company that Titanium's Founder and CEO, Michael Stollaire, has ever formed. In 1999, Mr. Stollaire founded EHI, a technology consultancy specializing in enterprise infrastructure management.

EHI and its consultants are known in the industry as top-tier, elite personnel, as shown by their impressive [Client List](#) and [Testimonials](#).

Most Blockchain start-ups and ICOs face a very serious problem after they develop a viable product and or service: finding companies and people that will actually purchase them and use them.

Titanium will not have this problem. As EHI's sister company, Titanium will simply inherit EHI's clientele, and since EHI is considered a trusted source of excellent customer service and personnel, Titanium will also be held in high regard.

What follows is a short excerpt of some of EHI's customers, which Titanium will leverage immediately:



As you can see, the Titanium project had a huge advantage over other Blockchain start-ups and ICOs, before anyone on the Titanium Team ever lifted a finger.

Titanium Blockchain Infrastructure Services Inc.
15027 Dickens Street, Suite 4, North Hollywood, CA, 91403, USA
info@tbis.io ~ TEL: 1.833.DIAL.TITANIUM

EXHIBIT 2



ALL LOGOS
REMOVED.
APOLOGIES!

Patrick Flaherty
Managing Associate General
Counsel
Legal Department

1320 N. Courthouse Road
Floor 9
Arlington, VA 22201, U.S.A.
patrick.m.flaherty@verizon.com
T 703.351.3020

WE ARE THE REVOLUTION.

MAIL (info@tbis.io)

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North Hollywood, CA, 91403, USA

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Titanium Blockchain Infrastructure Services Inc.

Attn: Legal Department

March 2, 2018

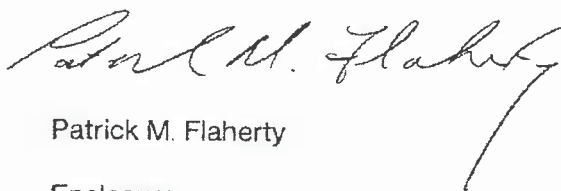
Page 2

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Patrick M. Flaherty

Enclosure