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

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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 EDWARD O.**  
**GRAMLING**

**DECLARATION OF EDWARD O. GRAMLING**

I, Edward O. Gramling, declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am employed by Pfizer, Inc. (“Pfizer”) as an Assistant General Counsel. I have personal knowledge of the matters set forth below and, if called as a witness, would testify to these facts under oath.

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

3. Pfizer is a research-based, global pharmaceutical company.

4. On or about February 8, 2018, the SEC requested that Pfizer provide it with certain information concerning companies called Titanium Blockchain Infrastructure Services, Inc. (“TBIS”) and EHI Internetwork and Systems Management, Inc. (“EHI”), and an individual named Michael Stollaire aka Michael Stollery or Michael Stoller (“Stollaire”).

5. In my capacity as an Assistant General Counsel of Pfizer, I am required, periodically and as needed, to become familiar with the entities with which Pfizer has contracts, agreements, and/or other substantive business relationships including alliances and partnerships. In addition, in my capacity as an Assistant General Counsel of Pfizer, I share responsibility with other members of the Pfizer’s legal department, intellectual property counsel, and others to protect Pfizer’s trade name, trademarks, and service marks from infringement and other unauthorized uses by third parties. In response to the SEC’s request, and at my direction, Pfizer’s personnel reviewed the books, records, files, and computer systems of the business units within Pfizer that might reasonably be expected to have or to have had any type of business relationship with TBIS or EHI or Stollaire including as a customer, client, vendor, employee, contractor, consultant, or other type of business transaction.

6. Pfizer keeps and maintains business records in the course of its transactions and regularly conducted activities as a regular practice. It is Pfizer’s practice to prepare such records at or near the time of the occurrence of the matters

1 set forth by, or from information transmitted by, a person with knowledge of those  
2 matters. Pfizer maintains books and records of entities and persons with which it has  
3 contracts, agreements, and/or other substantive business relationships, such the  
4 purchase and sale of a product or service, making an investment, or entering into an  
5 alliance or partnership, including authorized uses by third parties of its trade name,  
6 trademarks, and service marks. Pfizer also maintains books and records of entities  
7 and persons with which it has engaged as an employee, vendor, contractor, or  
8 consultant. For the purposes of this declaration, as an Assistant General Counsel of  
9 Pfizer, I am the custodian of those records or am otherwise qualified to testify about  
10 them.

11 7. Pfizer's books and records are current as of the date of this declaration.  
12 The search of these materials has not disclosed any current or past business  
13 relationship of any kind between Pfizer and TBIS or EHI or Stollaire directly.

14 8. The search of these materials indicates that Pfizer used the services of  
15 Accenture, as a third party contractor, to provide certain information technology  
16 ("IT") services to Pfizer and that Stollaire worked on the IT services between April  
17 26, 2016 and November 30, 2016 at which time Stollaire's involvement ceased.  
18 These materials indicate the scope of the IT services involved commercially available  
19 IT products and services used by Pfizer, and did not include blockchain technology or  
20 digital currency.

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

26 10. Pfizer sent Stollaire a cease and desist letter on March 15, 2018, a true  
27 and correct copy of which is attached hereto as Exhibit 1.



# **EXHIBIT 1**

# Arnold Porter

Paul C. Llewellyn  
+1 212.836.7828 Direct  
Paul.Llewellyn@arnoldporter.com

March 15, 2018

**VIA FEDEX**

Mr. Michael Stollaire  
Titanium Blockchain Infrastructure Services, Inc.  
15027 Dickens Street, Suite 4  
North Hollywood, CA 91403

Mr. Michael Stollaire  
EHI-INSM Inc.  
15027 Dickens Street, Suite 4  
North Hollywood, CA 91403

Re: Unauthorized Use of the PFIZER® Trademarks and Logos by Michael Stollaire,  
Titanium Blockchain Infrastructure Services, Inc., and EHI-INSM Inc.




Dear Mr. Stollaire:

We write on behalf of our client Pfizer Inc. (“Pfizer”) with regard to your unauthorized use of Pfizer’s valuable trademarks and logos. In particular, it has come to our client’s attention that you have used, without authorization, the federally-registered PFIZER trademark and logo on the websites for both Titanium Blockchain Infrastructure Services, Inc. (“Titanium Blockchain”) and EHI-INSM Inc. (“EHI”), and have falsely asserted that Pfizer has been a client of your companies’ services, as shown in the webpages attached as Exhibit A.

As you are undoubtedly aware, Pfizer Inc. is one of the world’s largest pharmaceutical manufacturers and sellers and maintains global operations in more than 150 countries. Pfizer owns numerous federal trademark registrations for the mark PFIZER, including U.S. Trademark Registration Nos. 626088, 2951026, 3932037, 3125531 and 5082880, covering both the word mark PFIZER and the stylize “PFIZER” oval logo. Pfizer’s federal registrations covering these marks include without limitation the following:

# Arnold Porter

Mr. Michael Stollaire  
 March 15, 2018  
 Page 2

U.S. REG. NO.	MARK	REG. DATE
0626088		May 1, 1956
3125531		August 8, 2006
3932037		March 15, 2011
2951026	PFIZER	May 17, 2005
4245996	PFIZER	November 20, 2012
5082880	PFIZER	November 15, 2016
3114047	PFIZER BRIDGE PROGRAM	July 11, 2006
4593658	PFIZER RXPATHWAYS	August 26, 2014
4018192	PFIZER INJECTABLES	August 30, 2011
5157646	PFIZER CENTERONE	March 7, 2017

Pfizer uses these extremely well-known marks in connection with the sale of a wide variety of pharmaceutical products and consumer healthcare products. Pfizer has expended millions of dollars to promote these marks, and has achieved billions of dollars of sales under the marks. As a result of the extensive use of the marks in advertising and the enormous sales success under those marks, the marks have become closely associated by the public with Pfizer, which owns strong trademark rights in these marks, has developed an excellent reputation for its products and services offered under the marks, and has garnered substantial goodwill in the marks.

Notwithstanding Pfizer's strong rights in the PFIZER word mark and logo described above, your companies have reproduced these marks to promote your services, by listing Pfizer and using the PFIZER logo among various companies that purportedly are clients of your companies. On the Titanium Blockchain website, a recent version of the "About Us" page at [tbis.io/about-us/](http://tbis.io/about-us/) (see Exhibit A) displayed the PFIZER logo among a group that the website claims are "some of EHI's customers."<sup>1</sup> On the EHI website, the Pfizer logo is among the first to appear under a page titled "Our Clients".

<sup>1</sup> We note that the [tbis.io](http://tbis.io) website is currently "under construction." We demand that the company refrain from any reference to Pfizer or its marks on any new or revised pages at this website.



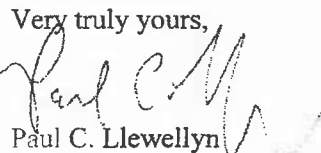
## Arnold Porter

Mr. Michael Stollaire  
March 15, 2018  
Page 3

Pfizer has never engaged Titanium Blockchain, EHI, or Michael Stollaire, nor has it in any way authorized any use of its name or logo by them. Accordingly, these references to Pfizer and these uses of the PFIZER name and logo constitute false representations in commercial advertising, and are very likely to cause confusion among prospective purchasers as to the association, endorsement or approval of your companies' services by Pfizer, and to cause prospective purchasers to mistakenly believe that Pfizer has in fact retained these companies' services, all of which is false. Under these circumstances, confusion and a false understanding among prospective purchasers are not only likely, but are inevitable. Further, the use of the Pfizer logos in this manner inevitably dilutes the distinctive nature of these famous marks. Accordingly, the foregoing conduct constitutes, among other things, trademark infringement and dilution, false designation of origin, false endorsement, false association, false advertising and unfair competition in violation of the federal Lanham Act, 15 U.S.C. §§ 1114, 1125(a) and 1125(c), and state law.

Your actions described above are a matter of great concern to Pfizer, which has spent significant sums of money and considerable effort developing its valuable trademark rights and is committed to protecting those rights. Pfizer requests that, within five days of the receipt of this letter, you cease and desist from all use of the PFIZER mark and logo and all other references to Pfizer in connection with your companies and businesses, including without limitation on the websites described above as well as in all other forms of advertising, marketing and promotion, and agree to refrain in the future from any such uses of Pfizer's marks and references to Pfizer.

We trust that you will appreciate the seriousness of this matter and will act immediately to comply with the foregoing requests, so that this matter can be put to rest.

Very truly yours,  
  
Paul C. Llewellyn

PCL.ms  
Attachment



**Exhibit A**

**Titanium Blockchain**  
INFRASTRUCTURE SERVICES

Home About Us Our Team Services White Paper Media Roadmap Token Sale Insights Contact

## ABOUT US

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

### The ETH Advantage





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

ETH and its consultants are known in the industry as top-tier elite personnel, as shown by their impressive LinkedIn and Indeed profiles.

Most blockchain start-ups and ICOs face a very common 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 ETH's sister company, Titanium will simply inherit ETH's clientele, and since ETH is considered a trusted source of excellent enterprise source and personnel, Titanium will also be held in high regard.

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

*As you can see, the Titanium project had a huge advantage over other Blockchain start-ups and ICO's. Before anyone on the Titanium team ever lifted a finger.*

Titanium Blockchain Infrastructure Services Inc.  
15027 Wiltons Street, Suite 4, North Hollywood, CA, 91603 USA  
info@titanium-eth.com | ETH | TRUE | AOL | DISNEY

ehi-dsm.com

EHI-DSM Inc. | Clients

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Home About Services Products Partners Clients Demo Support

## Our Clients

Nothing says more than our clients experience with EHI.

We have had the pleasure of working with global leaders in various industries. Our ITIL approach to solving business problems with IT solutions is unique, which has allowed us to help our clients to become more successful in their efforts. Don't take our word for it... just take a look at what some of our clients have said.



# **EXHIBIT 2**



Porter

Paul C. Llewellyn  
+1 212.836.7828 Direct  
Paul.Llewellyn@arnoldporter.com

*This has been fixed. Sorry!*

WE ARE THE REVOLUTION.

**VIA FEDEX**

Mr. Michael Stollaire  
Titanium Blockchain Infrastructure Services, Inc.  
15027 Dickens Street, Suite 4  
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