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

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

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 PAMELA J.
KOTTKAMP

1 SEC's request, and at my direction, Boeing's personnel reviewed the books, records,
2 files, and computer systems of the business units within Boeing that might reasonably
3 be expected to have or to have had any type of business relationship with TBIS or
4 EHI or Stollaire including as a customer, client, vendor, employee, contractor,
5 consultant, or other type of business transaction.

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

19 7. Boeing's books and records are current as of the date of this declaration.
20 The search of these materials has not disclosed any current or past business
21 relationship of any kind between Boeing and TBIS or EHI. Our records do indicate
22 that Stollaire was, at one time, employed, through a contract labor supplier, as a
23 contract employee for Boeing under the name of Michael Stollery.

24 8. The search of these materials indicates that Boeing used the services of a
25 third party contractor to provide certain information technology ("IT") services to
26 Boeing and Stollaire worked on the IT services between approximately June 2013
27 and June 19, 2014, at which time Stollaire's involvement ceased. These materials
28 indicate the scope of the IT services involved the use of commercially available

1 Hewlett Packard IT products and services used by Boeing, and did not include
2 blockchain technology or digital currency.

3 9. The SEC provided Boeing with copies of purported testimonials
4 attributed to Boeing employees David Christianson and Laura Razor that appeared on
5 the TBIS and EHI websites. The search of Boeing's books and records has disclosed
6 that Mr. Christianson and Ms. Razor are currently employed by Boeing and were
7 employees at the time Stollaire was a contractor at Boeing. The publication of these
8 purported testimonials on the TBIS and EHI websites was not authorized by Boeing.

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

14 11. Boeing sent Stollaire a cease and desist letter via U.S.P.S. Certified Mail
15 # 7013 3020 0000 9543 6799 on March 16, 2018, a true and correct copy of which is
16 attached hereto as Exhibit 1. Boeing received a U.S.P.S. Receipt of Certified Letter
17 Delivery #7013 3020 0000 9543 6799 showing the letter was delivered to Stollaire
18 and signed for on March 21, 2018, a true and correct copy of which is attached hereto
19 as Exhibit 2.

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

22 Executed this 28th day of March, 2018 at Arlington, Virginia.

23
24 
25 Pamela J. Kottkamp
26
27
28

EXHIBIT 1



EXHIBIT 1

March 15, 2018

Michael Stollaire
President & CEO
Titanium Blockchain Infrastructure Services, Inc.
15027 Dickens Street
Suite 4
Sherman Oaks, CA 91403-5983

Re: Use of BOEING logo

Dear Mr. Stollaire:

I write on behalf of Boeing, owner of the world famous BOEING trademark. It has recently come to our attention that Titanium Blockchain Infrastructure Services (TBIS) claims an affiliation with Boeing and displays the BOEING logo in its informational brochure as part of a client list. Please see <https://tbis.io/TBIS-white-paper-v2-7/>.

Additionally, EHI displays the BOEING logo at its website in the same manner at <http://www.ehiinsm.com/>.

I must inform you that I cannot find an agreement indicating that Boeing has authorized either TBIS or EHI to use Boeing's trademarks. As I hope you can appreciate, Boeing must carefully control the use of its intellectual property, such as its logo for which it holds numerous trademark registrations, and does not condone its use without proper authorization. For example, placing the BOEING logo on a client list, as appears to be the case here, constitutes use of Boeing's trademark and would require a license from Boeing.

Accordingly, I respectfully request that TBIS and EHI please remove Boeing's logo from their respective advertising materials at their earliest convenience.

If you believe that you have received authorization, please reply with a copy.

I look forward to hearing from you.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Anderson".

Mark Anderson
Intellectual Property Enforcement
The Boeing Company
mark.d.anderson10@boeing.com
+1 314 232 4013



REQUEST FOR SPECIAL MAIL SERVICES
St. Louis

1. For classified material to be delivered within continental U.S., use Certified mail for Confidential, Registered mail for Secret. These shipments must be processed through a Security Service Center. Request No. **005031**

2. No special mail services will be rendered without this form.

3. Select Type of mailing:

A. Domestic B. International

A. Domestic

Please check one:

Certified Next Morning Second Day
 Registered Next Day Traceable Ground Service

Return receipt requested?

Yes Return receipt for Certified, Registered, or US Postal Express ONLY
 No

Date of Letter 03/15/2018	Letter Ref. No.	If not correspondence, describe. Cease & desist
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Addressee

Michael Stollaire
Titanium Blockchain Infrastructure Services
15027 Dickens Street
Suite 4
Sherman Oaks, CA 91403-5983

4. Requester Information

BEMSID	Name	Dept. No.	Mailcode	Phone	Request Date
1789676	Mark D Anderson	35-IP-9000	S306-5135	314-232-4013	3/15/2018



The Boeing Company
2900 Airport Blvd., Everett, WA 98203
Phone: (425) 873-4200

Michael Stollaire
Titanium Blockchain Infrastructure Services
15027 Dickens St.
Suite 4
Sherman Oaks, CA 91403-5973

EXHIBIT 2

EXHIBIT 2

7043 5020 0000 4543 6799

Domestic International

A. Domestic

Please check one:

<input checked="" type="checkbox"/> Certified	<input type="checkbox"/> Next Morning	<input type="checkbox"/> Second Day	Re
<input type="checkbox"/> Registered	<input type="checkbox"/> Next Day	<input type="checkbox"/> Traceable Ground Service	<input checked="" type="checkbox"/>

Date of Letter 03/15/2018	Letter Ref. No.	If not correspondence, describe Cease & desist
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Addressee
 Michael Stollaire
 Titanium Blockchain Infrastructure Services
 15027 Dickens Street
 Suite 4
 Sherman Oaks, CA 91403-5983

3-16-18

4. Requester Information

BEMSID 1789676	Name Mark D. Anderson	Dept. No. 35-IP-9000	Mailcode 3906-5135
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SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY														
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. <i>3-16-18</i> 	<p>A. Signature <input checked="" type="checkbox"/> <i>[Signature]</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>														
<p>1. Article Addressed to: <i>M. STOLLAIRE</i> <i>15027 DICKENS ST.</i> <i>STE 4</i> <i>SHERMAN OAKS, CA</i> <i>91403-5983</i></p>	<p>B. Received by (Printed Name) <i>[Signature]</i> C. Date of Delivery <i>3-21-18</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>														
<p style="text-align: center;">  9590 9402 1994 6123 3443 85 </p>	<p>3. Service Type</p> <table border="0"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input checked="" type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input type="checkbox"/> Return Receipt for Merchandise</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Delivery Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</td> <td></td> </tr> </table>	<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input checked="" type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Return Receipt for Merchandise	<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	
<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®														
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™														
<input checked="" type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery														
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Return Receipt for Merchandise														
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™														
<input type="checkbox"/> Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery														
<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)															
<p>7013 3020 0000 9543 6799</p>															
<p>PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt</p>															

USPS TRACKING #



First-Class Mail
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P O Box 516
St. Louis, MO 63166

