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CENTRAL DISTRICT OF CALIFORNIA  
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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 ERIK**  
**BIERBAUER**

1 **DECLARATION OF ERIK BIERBAUER**

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

3 1. I am employed by NBCUniversal Media, LLC (“NBCUniversal”) in  
4 New York as Vice President, Litigation. I have personal knowledge of the matters set  
5 forth below and, if called as a witness, would testify to these facts under oath.

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

8 3. NBCUniversal is a subsidiary of Comcast Corporation and is one of the  
9 world’s leading providers of entertainment, news and sports programming.

10 NBCUniversal owns and operates entertainment and news cable networks, the NBC  
11 and Telemundo broadcast networks, local television stations, television production  
12 operations, Internet-based businesses, a major motion picture company and theme  
13 parks.

14 4. On or about February 7, 2018, the SEC requested that NBCUniversal  
15 provide it with certain information concerning companies called Titanium Blockchain  
16 Infrastructure Services, Inc. (“TBIS”) and EHI Internetwork and Systems  
17 Management, Inc. (“EHI”), and an individual named Michael Stollaire aka Michael  
18 Stollery or Michael Stoller (“Stollaire”).

19 5. As a regular practice in the ordinary course of its business,  
20 NBCUniversal maintains books and records that reflect, as accurately as is reasonably  
21 possible, entities and persons with which it has contracts, agreements, and other  
22 significant business relationships, such the purchase and sale of products or services,  
23 making an investment, or entering into a formal business alliance or partnership,  
24 including authorized uses by third parties of its trademarks and service marks.

25 NBCUniversal also maintains books and records that reflect, as accurately as is  
26 reasonably possible, entities and persons that it has engaged as an employee, vendor,  
27 contractor or consultant. It is NBCUniversal’s practice to prepare the foregoing  
28 records at or near the time of the occurrence of the matters set forth by, or from

1 information transmitted by, a person with knowledge of those matters. For the  
2 purposes of this declaration, I am a custodian of those records or am otherwise  
3 qualified to testify about them.

4 6. In response to the SEC's request, and at my direction, NBCUniversal  
5 personnel reviewed the available books and records of the business units within  
6 NBCUniversal that might reasonably be expected to have or to have had a business  
7 relationship with TBIS or EHI or Stollaire including as a vendor, employee,  
8 contractor, consultant or other type of business transaction.

9 7. Specifically, NBCUniversal personnel searched the following books and  
10 records:

11 a. Company-wide accounts payable records dating back to at least  
12 the year 2000.

13 b. Records of company-wide single sign-on identification credentials  
14 (SSO) dating back to 2001. Upon hiring, NBCUniversal assigns a unique SSO to  
15 each of its employees and contractors who require access to NBCUniversal's internal  
16 computer network and information technology systems.

17 c. Human resources databases of employees of NBCUniversal and  
18 its predecessor companies dating back to at least 1996.

19 d. Records of permissions that have been granted to individuals and  
20 entities to use trademarks or service marks associated with Universal Studios,  
21 including the "Universal" name or logo. Universal Studios is a division of  
22 NBCUniversal, and the "Universal" name and logo are the intellectual property of  
23 NBCUniversal. These permissions records date back to at least 1997, and in some  
24 cases to 1989.

25 8. The books and records described in paragraph 7 are current as of the date  
26 of this declaration. The search of these materials has not disclosed any current or past  
27 employment, contractor or business relationship between NBCUniversal and TBIS or  
28 EHI or Stollaire.

1           9.     In addition, the search of these materials has not disclosed that  
2 NBCUniversal has ever authorized TBIS, EHI or Stollaire to use any mark associated  
3 with Universal Studios, including the “Universal” name or logo, in any marketing or  
4 advertising.  
5

6           I declare under penalty of perjury under the laws of the United States of  
7 America that the foregoing is true and correct.  
8

9           Executed this 26<sup>th</sup> day of March, 2018 at New York, New York.  
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Erik Bierbauer  
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