

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

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Email: browndav@sec.gov

3 Attorneys for Plaintiff  
4 Securities and Exchange Commission

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

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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**  
27 **STOLLAIRE,**

28 **Defendants.**

Case No. **CV18-4315-DSF(JPRx)**  
**DECLARATION OF LAWRENCE S.**  
**ACHORN**



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

14           7. Intel's practice is to keep its books and records current and on that basis  
15 I believe them to be current as of the date of this declaration. I requested that a  
16 search be conducted of Intel's books and records to look for records mentioning TBIS  
17 or EHI. The search included a review of Intel's accounts payable system, which is  
18 the system Intel uses to pay its vendors and others. No records pertaining to TBIS or  
19 EHI were found in Intel's accounts payable system, and the absence of any such  
20 records confirms that Intel has not been a paying customer or client of either TBIS or  
21 EHI. Intel's records also show that it had no employer-employee relationship with  
22 Stollaire directly.

23           8. Intel's records did establish that Intel used the services of a third party  
24 contractor to provide certain information technology ("IT") services for Intel and  
25 Stollaire worked as a temporary contractor on the IT services between May 2016 and  
26 August 2016, when his involvement ceased.


27           9. The search of Intel's records indicated that Intel has not authorized TBIS  
28 or EHI or Stollaire to use Intel's name or logo in their marketing or advertising or for

1 any other purpose. If such authorization had been given, it would be Intel's regular  
2 practice to memorialize such authorization in its records. The "Intel" name and logo  
3 are the intellectual property of the company. Intel considers a third-party's  
4 unauthorized use of the "Intel" name or logo in marketing or advertising as an  
5 infringement of its intellectual property.

6 10. Intel sent TBIS a cease and desist letter on February 21, 2018, a true and  
7 correct copy of which is attached hereto as Exhibit 1. Intel was in email  
8 communication with Stollaire about that letter between February 25 and March 1,  
9 2018, true and correct copies of which are attached hereto as Exhibit 2.

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

12 Executed this 26<sup>th</sup> day of March, 2018 at Santa Clara, California.

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15 Lawrence S. Achorn  
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# **EXHIBIT 1**



**Via FedEx and Email**

February 21, 2018

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

Re: Unauthorized use of the Intel corporate logo

Dear Madame/Sir:

It has recently come to our attention that you are using the Intel corporate logo without permission or license to identify Intel Corporation ("Intel") as a client of your company. See e.g., <https://tbis.io/wp-content/uploads/2018/01/TBIS-White-Paper-v2.7.pdf>

Intel does not permit its corporate logo to be used in this manner.

Please remove all uses of the Intel corporate logo from your materials immediately.

Please send your confirmation that your company has ceased all use of the Intel corporate logo to me by **February 26, 2018** at the latest. Thank you.

Very truly yours,

*/s/Stephen Kampmeier*

Stephen Kampmeier  
Trademarks and Brands Legal  
INTEL CORPORATION  
Tel: (408) 765-0143  
Fax: (408) 765-6071  
E-mail: [stephen.f.kampmeier@intel.com](mailto:stephen.f.kampmeier@intel.com)

**Intel Corporation**  
2200 Mission College Blvd.  
RNB-4-151  
Santa Clara, CA 95054

# **EXHIBIT 2**

**Achorn, Larry**

---

**From:** Michael Stollaire <michael.stollaire@tbis.io>  
**Sent:** Thursday, March 01, 2018 3:41 PM  
**To:** Kampmeier, Stephen F  
**Cc:** Bayley, Christina  
**Subject:** Re: Removal of the Intel Corporate Logo

OK, so I delegated this to someone, and obviously, you cannot get good help nowadays.

Give me just a few minutes and I will let you know when this is fixed.

We are 20 minutes away from a major software release, so it may be around 30 minutes, maximum, FYI.

I just want to set the correct expectation.

Apologies for this. I will handle it myself.

On Thu, Mar 1, 2018 at 12:08 PM Kampmeier, Stephen F <[stephen.f.kampmeier@intel.com](mailto:stephen.f.kampmeier@intel.com)> wrote:

Michael,

Following my response, "Thanks for the update. ", the page I attached below was audited and found to still contain the Intel corporate® logo.

Apologies if that was unclear.

When I checked this morning, that page (<https://tbis.io/wp-content/uploads/2018/01/TBIS-White-Paper-v2.7.pdf>) still showed the Intel corporate logo.

Does that clarify what I am asking for?

Stephen F. Kampmeier | Registered In-House Counsel | [Trademarks & Brands Legal](#) |  
Intel Corporation | 408.765.0143 | [stephen.f.kampmeier@intel.com](mailto:stephen.f.kampmeier@intel.com)

**From:** Michael Stollaire [<mailto:michael.stollaire@tbis.io>]  
**Sent:** Thursday, March 1, 2018 11:50 AM



**To:** Kampmeier, Stephen F <[stephen.f.kampmeier@intel.com](mailto:stephen.f.kampmeier@intel.com)>

**Subject:** RE: Removal of the Intel Corporate Logo

I already updated you days ago, saying it WAS removed and you actually responded to my email, saying "Thanks for the update. "

It is removed and my sincere apologies for this matter. I honestly didn't know this would be an issue, as I would have NEVER done such a thing in the first place.

Thank you.

On Mar 1, 2018 11:18 AM, "Kampmeier, Stephen F" <[stephen.f.kampmeier@intel.com](mailto:stephen.f.kampmeier@intel.com)> wrote:

Michael,

Please let me have an update on this matter.

Has your company removed the Intel® corporate logo found below?

Please let me know by close of business tomorrow (March 2, 2018) at the latest.

Thank you.

Stephen F. Kampmeier | Registered In-House Counsel | [Trademarks & Brands Legal](#) |  
Intel Corporation | [408.765.0143](tel:408.765.0143) | [stephen.f.kampmeier@intel.com](mailto:stephen.f.kampmeier@intel.com)

**From:** Kampmeier, Stephen F  
**Sent:** Sunday, February 25, 2018 3:15 PM  
**To:** Michael Stollaire <[michael.stollaire@tbis.io](mailto:michael.stollaire@tbis.io)>  
**Cc:** Bayley, Christina <[christina.bayley@intel.com](mailto:christina.bayley@intel.com)>  
**Subject:** RE: Removal of the Intel Corporate Logo  
**Importance:** High

Michael,

Please remove the Intel® corporate logo from the publication below and any other such uses.

Thank you.

Stephen F. Kampmeier | Registered In-House Counsel | [Trademarks & Brands Legal](#) |  
Intel Corporation | [408.765.0143](tel:408.765.0143) | [stephen.f.kampmeier@intel.com](mailto:stephen.f.kampmeier@intel.com)

https://tbis.io/wp-content/uploads/2018/01/TBIS-White-Paper-v2.7.pdf

File Edit View Favorites Tools Help

Home Comment View Form Protect Share

Hand Select Snapshot Clipboard Actual Size Fit Page Fit Width Fit Visible Rotate Left Rotate Right Typewriter Highlight PDF Sign Link Bookmark

Tools View Comment Protect Links

Bookmarks

CLIENTS INCLUDE

accenture Apple

Cargill Citizel Bank

Exelon GE

IBM intel

SANTA BARBARA BANK & TRUST synch

Royal Bank of Scotland TRUE

**From:** Michael Stollaire [<mailto:michael.stollaire@tbis.io>]  
**Sent:** Sunday, February 25, 2018 7:59 AM  
**To:** Kampmeier, Stephen F <[stephen.f.kampmeier@intel.com](mailto:stephen.f.kampmeier@intel.com)>  
**Subject:** Removal of the Intel Corporate Logo

Mr. Kampmeier:

As per your recent letter, we have immediately removed the logo.

Please verify your reception?

Thanks,

~ Michael

--

Best Regards,

Michael Stollaire

CEO and Senior Enterprise

Management Specialist

Titanium Blockchain Infrastructure Services Inc.

Mobile: [+1.310.770.8586](tel:+13107708586)

Pager: [3107708586@vtext.com](tel:3107708586@vtext.com)

[Michael.Stollaire@tbis.io](mailto:Michael.Stollaire@tbis.io)

<https://www.tbis.io>

Twitter: @MichaelStollair

--

Best Regards,

Michael Stollaire  
CEO and Senior Enterprise  
Management Specialist  
Titanium Blockchain Infrastructure Services Inc.

Mobile: +1.310.770.8586

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Twitter: @MichaelStollair

**Achorn, Larry**

---

**From:** Michael Stollaire <michael.stollaire@tbis.io>  
**Sent:** Thursday, March 01, 2018 4:38 PM  
**To:** Kampmeier, Stephen F  
**Subject:** RE: Removal of the Intel Corporate Logo

Very good and my pleasure!

On Mar 1, 2018 4:25 PM, "Kampmeier, Stephen F" <[stephen.f.kampmeier@intel.com](mailto:stephen.f.kampmeier@intel.com)> wrote:

Thank you for addressing this yourself! I did not expect that.

I want to check with fresh eyes in the morning, but I will confirm when I have seen that it's down.

Best regards.

Stephen F. Kampmeier | Registered In-House Counsel | [Trademarks & Brands Legal](#) |  
Intel Corporation | [408.765.0143](tel:408.765.0143) | [stephen.f.kampmeier@intel.com](mailto:stephen.f.kampmeier@intel.com)

**From:** Michael Stollaire [<mailto:michael.stollaire@tbis.io>]  
**Sent:** Thursday, March 1, 2018 4:14 PM  
**To:** Kampmeier, Stephen F <[stephen.f.kampmeier@intel.com](mailto:stephen.f.kampmeier@intel.com)>  
**Subject:** Re: Removal of the Intel Corporate Logo

It is now removed, and I tested it myself. Please verify? Thanks!

On Thu, Mar 1, 2018 at 12:08 PM, Kampmeier, Stephen F <[stephen.f.kampmeier@intel.com](mailto:stephen.f.kampmeier@intel.com)> wrote:

Michael,

Following my response, "Thanks for the update. ", the page I attached below was audited and found to still contain the Intel corporate® logo.

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Does that clarify what I am asking for?

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Intel Corporation | [408.765.0143](tel:408.765.0143) | [stephen.f.kampmeier@intel.com](mailto:stephen.f.kampmeier@intel.com)

**From:** Michael Stollaire [<mailto:michael.stollaire@tbis.io>]  
**Sent:** Thursday, March 1, 2018 11:50 AM  
**To:** Kampmeier, Stephen F <[stephen.f.kampmeier@intel.com](mailto:stephen.f.kampmeier@intel.com)>

**Subject:** RE: Removal of the Intel Corporate Logo

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It is removed and my sincere apologies for this matter. I honestly didn't know this would be an issue, as I would have NEVER done such a thing in the first place.

Thank you.

On Mar 1, 2018 11:18 AM, "Kampmeier, Stephen F" <[stephen.f.kampmeier@intel.com](mailto:stephen.f.kampmeier@intel.com)> wrote:

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Intel Corporation | [408.765.0143](#) | [stephen.f.kampmeier@intel.com](mailto:stephen.f.kampmeier@intel.com)

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**To:** Michael Stollaire <[michael.stollaire@tbis.io](mailto:michael.stollaire@tbis.io)>  
**Cc:** Bayley, Christina <[christina.bayley@intel.com](mailto:christina.bayley@intel.com)>  
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Intel Corporation | [408.765.0143](#) | [stephen.f.kampmeier@intel.com](mailto:stephen.f.kampmeier@intel.com)



The image shows a screenshot of a web-based PDF viewer. The browser's address bar displays the URL: <https://tbis.io/wp-content/uploads/2018/01/TBIS-White-Paper-v2.7.pdf>. The viewer includes a menu bar (File, Edit, View, Favorites, Tools, Help) and a toolbar with various functions like Hand, Select, Snapshot, Clipboard, Fit Page, Fit Width, Fit Visible, Rotate Left, Rotate Right, Typewriter, Highlight, PDF Sign, Link, and Bookmarks. A 'Bookmarks' sidebar is visible on the left. The main content area features a large black rectangular redaction box covering the left side of the page. To the right of the redaction, the text 'CLIENTS INCLUDE' is followed by a grid of logos for various companies: accenture, Apple, Cargill, Citize Ban, Exelon, GE, IBM, inte, SANTA BARBARA BANK & TRUST, syncl, Royal Bank of Scotland, and TRUE.

**From:** Michael Stollaire [<mailto:michael.stollaire@tbis.io>]  
**Sent:** Sunday, February 25, 2018 7:59 AM  
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**Subject:** Removal of the Intel Corporate Logo

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~ Michael

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Best Regards,

Michael Stollaire

CEO and Senior Enterprise

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Michael.Stollaire@tbis.io

https://www.tbis.io

Twitter: @MichaelStollair

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Best Regards,

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