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CLERK, U.S. DISTRICT COURT
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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**
STOLLAIRE,

26 **Defendants.**

Case No. **CV18-4315-DSF(JPRx)**
DECLARATION OF RYAN P.
DOHERTY

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1 **DECLARATION OF RYAN P. DOHERTY**

2 I, Ryan P. Doherty, declare, pursuant to 28 U.S.C. § 1746, as follows:

3 1. I am employed by GE Capital US Holdings, Inc. (“GE Capital”), a
4 wholly-owned indirect subsidiary of General Electric Company (collectively, GE
5 Capital and General Electric Company hereinafter referred to as “GE”), as its Deputy
6 General Counsel/Group General Counsel. I have personal knowledge of the matters
7 set forth below and, if called as a witness, would testify to these facts under oath.

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

10 3. GE is the world’s Digital Industrial Company, transforming industry
11 with software-defined machines and solutions that are connected, responsive, and
12 predictive. Until on or about November 2015, Synchrony Financial (Synchrony”)
13 was part of GE Capital.

14 4. On or about February 12, 2018, the SEC requested that GE provide it
15 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. In my capacity as Deputy General Counsel/Group General Counsel of
20 GE, I am required, periodically and as needed, to become familiar with the entities
21 with which GE has contracts, agreements, and/or other substantive business
22 relationships including alliances and partnerships. In addition, in my capacity as
23 Deputy General Counsel/Group General Counsel of GE, I share responsibility with
24 other members of the GE’s legal department, intellectual property counsel, and others
25 to protect GE’s trade name, trademarks, and service marks from infringement and
26 other unauthorized uses by third parties. In response to the SEC’s request, and at my
27 direction, GE personnel reviewed the books, records, files, and computer systems of
28 the business units within GE that might reasonably be expected to have or to have

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

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

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

19 8. The search of these materials indicates that prior to Synchrony's
20 separation from GE Capital in 2015, GE engaged the services of a third party
21 contractor to provide certain information technology ("IT") services to Synchrony.
22 These materials indicate that Stollaire worked on the IT services between
23 approximately January 2015 and April 2016, at which time Stollaire's involvement
24 ceased. These materials indicate the scope of the IT services involved the use of
25 commercially available IT products and services, and did not include blockchain
26 technology or digital currency.

27 9. The search of these materials has not disclosed that GE has authorized
28 TBIS or EHI or Stollaire to use GE's name₂ or logo in their marketing or advertising

1 or for any other purpose. The “GE” name and logo are the intellectual property of
2 GE. GE considers a third-party’s unauthorized use of the “GE” name or logo in
3 marketing or advertising as an infringement of its intellectual property.
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5 I declare under penalty of perjury under the laws of the United States of
6 America that the foregoing is true and correct.

7 Executed this 20th day of March, 2018 at Norwalk, Connecticut.

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Ryan P. Doherty