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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 MICHAEL
BRUGGEMAN

1 **DECLARATION OF MICHAEL BRUGGEMAN**

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

3 1. I am employed by Cargill (“Cargill”) as Global IT Infrastructure Lead. I
4 have personal knowledge of the matters set forth below and, if called as a witness,
5 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. Cargill provides food, agriculture, financial and industrial products and
9 services to the world. Together with farmers, customers, governments and
10 communities, we help people thrive by applying our insights and 150 years of
11 experience.

12 4. On or about February 6, 2018, the SEC requested that Cargill provide it
13 with certain information concerning companies called Titanium Blockchain
14 Infrastructure Services, Inc. (“TBIS”) and EHI Internetwork and Systems
15 Management, Inc. (“EHI”), and an individual named Michael Stollaire aka Michael
16 Stollery or Michael Stoller (“Stollaire”).

17 5. In my capacity as Global IT Infrastructure Lead for Cargill, I am
18 required, periodically and as needed, to become familiar with the entities with which
19 Cargill has contracts, agreements, and/or other substantive business relationships
20 including alliances and partnerships. In response to the SEC’s request, Cargill’s
21 personnel reviewed the electronic and other records of the business units within
22 Cargill that might reasonably be expected to have or to have had any type of business
23 relationship with TBIS or EHI or Stollaire including as a customer, client, vendor,
24 employee, contractor, consultant, or other type of business transaction.

25 6. Cargill keeps and maintains business records in the course of its
26 transactions and regularly conducted activities as a regular practice, including books
27 and records of entities and persons with which it has contracts or other business
28 agreements and individuals with whom it has employment relationships. It is

1 Cargill’s practice to prepare such records at or near the time of the occurrence of the
2 matters set forth by, or from information transmitted by, a person with knowledge of
3 those matters.

4 7. Cargill’s books and records are current as of the date of this declaration.
5 The search of these materials has not disclosed any direct current or past business
6 relationship of any kind between Cargill and TBIS or EHI or Stollaire.

7 8. The search of these materials indicates that Cargill hired a third party
8 contractor, Dahl Consulting (“Dahl”), a contractor and temporary staffing provider, to
9 provide certain information technology (“IT”) services to Cargill. Stollaire was hired
10 by Dahl as a Senior Technical Analyst and was assigned by Dahl to provide IT
11 services to Cargill between June 30, 2014 and August 31, 2014, at which time
12 Stollaire’s assignment providing services to Cargill ceased. These materials indicate
13 the scope of the IT services involved the use of commercially available Hewlett
14 Packard IT products and services used by Cargill, and did not include blockchain
15 technology or digital currency.

16 9. The SEC provided Cargill with purported testimonials attributed to
17 “Mark Conty, Senior Enterprise Management Architect, Cargill” that appeared on the
18 TBIS and EHI websites. The search of Cargill’s books and records has disclosed that
19 Mr. Conty has not been employed by Cargill since 2014. These materials also
20 indicate that publication of this purported testimonial on the TBIS and EHI websites
21 was not authorized by Cargill.

22 10. The search of these materials has not disclosed that Cargill has ever
23 authorized TBIS or EHI or Stollaire to use Cargill’s name or logo in their marketing
24 or advertising. The “Cargill” name and logo are the intellectual property of the
25 company. Cargill considers a third-party’s such unauthorized use of the “Cargill”

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1 name or logo in marketing or advertising as an infringement of its intellectual
2 property.

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

5 Executed this 21th day of March, 2018 at Hopkins, Minnesota.

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8 Michael Bruggeman

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