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18 *Receiver for TBIS*

19 **UNITED STATES DISTRICT COURT**
20 **CENTRAL DISTRICT OF CALIFORNIA**

21 SECURITIES AND EXCHANGE
22 COMMISSION,

23 Plaintiff,

24 vs.

25 TITANIUM BLOCKCHAIN
26 INFRASTRUCTURE SERVICES,
27 INC.; EHI INTERNETWORK AND
28 SYSTEMS MANAGEMENT, INC.
aka EHI-INSM, INC.; and MICHAEL
ALAN STOLLERY aka MICHAEL
STOLLAIRE,

Defendants.

Case No. 18-4315 DSF (JPRx)

Assigned to Honorable Dale S. Fischer

**RECEIVER’S NOTICE TO COURT
REGARDING STATUS OF CLAIMS
PROCESS AND CLAIMS BAR DATE**

Claims Bar Date: August 11, 2021

1 **TO THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF**
2 **RECORD:**

3 **PLEASE TAKE NOTICE** that Josias N. Dewey, Court-appointed Receiver
4 (“Receiver”) for the estate of Defendant Titanium Blockchain Infrastructure Services,
5 Inc. (“TBIS”), hereby submits this Notice to the Court Regarding Status of Claims
6 Process and Claims Bar Date.

7 **COURT APPROVAL OF THE CLAIMS PROCESS AND**
8 **CLAIMS ADMINISTRATOR**

9 1. On August 21, 2020, the Court entered an Order Approving Claims Process
10 and Bar Date (Dkt. 96).

11 2. On December 8, 2020, the Court entered an Order Appointing a Claims
12 Administrator (Dkt. 100). Pursuant to that Order, the Receiver engaged RCB Fund
13 Services LLC (“RFS”) as claims administrator for purposes of effectuating the Court’s
14 August 21, 2020 Order approving the claims process.

15 3. On December 15, 2020, the Court granted TBIS and the Securities and
16 Exchange Commission’s (“SEC”) Joint Stipulation to Extend Claims Bar Date (Dkt.
17 101). Pursuant to that Order, the Court established that the claims period for potential
18 claimants of the Receivership Entities would run for 180 calendar days following
19 publication of the Claims Process Notice (the “Notice”). Any claims submitted after
20 11:59 p.m. Pacific Time on the date 180 calendar days following initial publication of
21 the Notice would be barred (the “Bar Date”). (Dkt. 101)

22 **DEVELOPMENT AND LAUNCH OF CLAIMS PORTAL**

23 4. The Receiver, RFS, and the Receiver’s counsel have worked diligently to
24 test, validate, and ultimately deploy a first-of-its-kind automated validation-based claims
25 process system (hereinafter, the “Claims Portal”).

26 5. The Claims Portal involves using the record of the fraudulent transaction –
27 the sale of unregistered securities represented by virtual ERC-20 cryptocurrency tokens
28 which exist on the public Ethereum blockchain network (“Ethereum Network”) – to

1 validate the legitimacy of claims and prevent fraudulent or duplicative claims. (*See* Dkt.
2 1; *see also* Dkt. 94) The Ethereum Network is the decentralized transaction ledger on
3 which Ether, one of the world’s most popular cryptocurrencies, exists. The Ethereum
4 Network reflects the fraudulent transactions insofar as it is, in and of itself, a ledger of
5 transactions.

6 6. The Claims Portal went live on February 27, 2021 and has been receiving
7 claims since that date.

8 **NOTICE OF CLAIMS PROCESS AND BAR DATE**

9 7. In anticipation of deploying the Claims Portal, including the online claims
10 site and Ethereum-based claims validation process, the Receiver investigated a number
11 of avenues to publish the Notice so as to maximize market penetration into the
12 population of potential claimants. With the assistance of RFS and other experts in
13 marketing strategies, and in accordance with the notice procedure previously outlined
14 and approved by the Court, the Receiver elected to adopt a hybrid notice process
15 involving both (i) notice by publication, and (ii) direct notice by email; the Receiver also
16 determined that notice by publication should be provided periodically during the claims
17 period so as to maximize market penetration.

18 8. The notice plan and form of notice was previously approved by this Court.
19 (*See* Dkt. 96 [referencing Dkt. 94, providing that Notice must include an explanation of
20 the fraud and circumstances under which TBIS sold unregistered securities, an
21 explanation of who is eligible for compensation and the claims process, the online portal
22 web address, the Claims Bar Date, copies of the Order approving the Claims Process,
23 and an email address for the Receiver] and Dkt. 94-1 [setting forth proposed form of
24 required Notice]).

25 9. On February 12, 2021, the Receiver published the initial Notice of the
26 Claims Process and Bar Date on PR Newswire and Twitter, thus establishing the Claims
27
28

1 Bar Date as August 11, 2021.¹

2 10. On March 2, 2021, the Receiver sent Notice of the Claims Process and Bar
3 Date by email to the potential claimants of the TBIS Estate whose email addresses are
4 known.

5 11. On March 21, 2021, the Receiver published a copy of the substance of the
6 Notice with Claims Bar Date on Coin Telegraph, one of the leading digital media
7 resources covering a wide range of news on blockchain technology, crypto assets, and
8 emerging fintech trends. *See* <https://cointelegraph.com/>.

9 12. In accordance with this Court’s prior orders, each of the Notices of the
10 Claims Process and Bar Date provided to-date have contained a detailed description of
11 the Action and circumstances under which TBIS sold unregistered securities, eligible
12 claimants and the claims process, information on how to submit a claim, the deadline for
13 submitting a claim, email contact information for the Receiver, and a link to the Claims
14 Process website. All Notices have also specifically informed potential claimants that:

15 NOTICE IS HEREBY GIVEN that all people with potential
16 claims for recovery from the TBIS Estate should file their claim
17 with the Receiver so that it is actually submitted on the
18 Receiver’s online claim system, <http://tbis.io/>, by **11:59 p.m.**
19 **(Pacific Time) on August 11, 2021** (the “Bar Date”). Claims
20 should be filed electronically through this online claim system.

21
22 Individuals or entities that believe they have good cause to either
23 extend the Bar Date or to submit their claim by other means
24 should request this from the Receiver at tbis@hklaw.com no later
25

26
27 ¹ There was a two-week delay between the initial Notice by publication and the roll-
28 out of the Claims Portal due to technical difficulties during final steps of testing the
portal and claims authentication process. For the reasons set forth below, no
extension of the Bar Date is presently needed or being requested due to this delay.

1 than the Bar Date. Unless a claim is subject to a Receiver-granted
2 exception, all claims against TBIS Estate assets that are not
3 received by the Bar Date are barred.

4 Attached hereto as composite *Exhibit "A"* is a true and correct copy of the PR
5 Newswire publication of the initial Notice, in PDF format, and the email sent to
6 potential claimants of the TBIS Estate whose email addresses are known.

7
8 13. Web traffic analytics indicate that the PR Newswire publication of the
9 Notice reached a total potential audience of 150 million individuals in the first month of
10 publication. During that time, 275 individual sources around the internet posted the
11 Notice in its entirety, known as "exact match pickups." These sources include Yahoo!
12 Finance, the Associated Press, and Seeking Alpha (one of the largest crowd-sourced
13 content services for financial markets and information). The PR Newswire publication
14 of the Notice was also distributed to approximately 1,000 Associated Press outlets,
15 including C-SPAN, FoxNews.com, CBS News Radio, the New York Times, and CNBC.
16 The sole Twitter post with a link to the Notice reached an average potential audience of
17 5,086 individuals. From February 12 to March 10, 2021, the PR Newswire post received
18 roughly 9,000 views and hits, comprised of approximately 512 "media" views and 7,000
19 "public" views, among others. Also, within the first 48 hours of the portal going "live,"
20 the portal received claims originating from 23 different countries. Analytics are not yet
21 available for the Coin Telegraph publication.

22 14. The Receiver intends to make subsequent publications of the Notice
23 throughout the claims period, including on PR Newswire, Coin Telegraph, and Twitter.
24 At present, the Receiver expects to make additional publications as follows:

- 25 a. On or about June 11 to July 11, 2021, the Receiver will publish a
26 reminder publication with the substance of the Notice and Claims Bar
27 Date on PR Newswire.
28

1 claims had been created, but not yet finalized, meaning that claimants still had to take
2 additional steps to finish the claims submission (e.g., upload documentation). 25 claims
3 were deemed to be duplicates.

4 18. Relatedly, the Receiver has been fielding and responding to a multitude of
5 inquiries from claimants and potential claimants regarding the claims process.

6 19. The Claims Portal will remain open until 11:59 p.m. Pacific Time on
7 August 11, 2021.

8 20. The Receiver is prepared to provide additional information to the Court as
9 requested. Otherwise, the Receiver plans to provide a further update to the Court on or
10 about June 11, 2021, which will be approximately 60-days before the Claims Bar Date.

11
12
13 Dated: March 22, 2021.

Respectfully submitted,

14
15 */s/ Kristina S. Azlin* _____

16 Kristina S. Azlin
17 Samuel J. Stone
18 Jose A. Casal (*pro hac vice*)
Holland & Knight LLP

19 *Attorneys for Josias N. Dewey, Court-appointed*
20 *Receiver for TBIS*
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EXHIBIT A

The Receiver of the Titanium Blockchain Infrastructure Services, Inc. ("TBIS") Estate Announces Notice of Bar Date to Submit Claims Against TBIS Receivership Estate

NEWS PROVIDED BY

TBIS Receivership Estate →

Feb 12, 2021, 12:35 ET

Securities and Exchange Commission v. Titanium Blockchain Infrastructure Services, Inc.; EHI Internetwork and Systems Management, Inc. aka EHI-INSM, Inc.; and Michael Alan Stollery aka Michael Stollaire, Civil Action No. 18-cv-4315 DSF (JPRx)

NEW YORK, Feb. 12, 2021 /PRNewswire/ -- The following notice has been issued by the receiver of the Titanium Blockchain Infrastructure Services, Inc. ("TBIS") Estate pursuant to the Order authorizing Claims Process and Bar Date dated August 21, 2020, as modified December 15, 2020, in the action *Securities and Exchange Commission v. Titanium Blockchain Infrastructure Services, Inc.; EHI Internetwork and Systems Management, Inc. aka EHI-INSM, Inc.; and Michael Alan Stollery aka Michael Stollaire, Civil Action No. 18-cv-4315 DSF (JPRx)*, before the United States District Court for the Central District of California.

NOTICE OF CLAIMS PROCESS AND CLAIMS BAR DATE

THIS NOTICE MAY AFFECT YOUR LEGAL RIGHTS. PLEASE READ IT CAREFULLY. AMONG OTHER THINGS, FAILURE TO TIMELY SUBMIT A CLAIM PURSUANT TO THE DIRECTIONS BELOW MAY RESULT IN YOUR CLAIM BEING BARRED FROM A DISTRIBUTION

To Potential Claimant:

On May 30, 2018, the above-captioned Court entered an Order appointing Josias Dewey as Receiver for the estate of Titanium Blockchain Infrastructure Services ("TBIS Estate"). On August 21, 2020, the Court entered an Order authorizing the Claims Process and Bar Date, as modified December 15, 2020. Copies of these orders and other information regarding this case are available on the TBIS Receivership website at <http://tbis.io>.

You are receiving this Notice because our records indicate you may hold a claim against the TBIS Estate. Receiving this Notice does not mean that you hold a claim or that your claim will be eligible for a distribution from the TBIS Estate.

The TBIS Case

As alleged by the United States Securities and Exchange Commission, Titanium President Michael Alan Stollery, a/k/a Michael Stollaire, lied about business relationships with the Federal Reserve and dozens of well-known firms for purposes of promoting an Initial Coin Offering ("ICO"). Titanium's website contained fabricated testimonials from these supposed corporate customers. These fraudulent statements were used to promote the ICO, which Stollaire advertised through videos and social media. The SEC's complaint charged Stollaire and Titanium with violating Sections 5(a), 5(c), and 17(a) of the Securities Act of 1933 and Section 10(b) of the Securities Exchange Act of 1934 and Rules 10b-5(a) and 10b-5(c) thereunder. The complaint charged another Stollaire company, EHI Internetwork and Systems Management Inc., with violating Section 17(a) of the Securities Act and Section 10(b) of the Exchange Act and Rules 10b-5(a) and 10b-5(c) thereunder.

Eligible Claimants and Claims Process

You may be eligible to submit a claim if you: (i) are a creditor of Titanium; (ii) directly purchased Titanium Bar ("BAR") or TBAR from Titanium; (iii) purchased BAR from a third party (other than Titanium) prior to February 22, 2018, held such BAR through February 22, 2018, received TBAR from Titanium by virtue of your BAR holdings, and held such TBAR through May 29, 2018; or (iv) purchased TBAR from a third party (other than Titanium) prior to May 29, 2018 and held such TBAR through May 29, 2018.

How Do I Submit a Claim?

Information regarding the claims process is available on the Receiver's website, <http://tbis.io>, including necessary instructions on how to submit a claim through the online claim system. Case 2:18-cv-04315-DSF-JPR Document 102 Filed 03/22/21 Page 11 of 16 Page ID #:1901

Deadline for Submitting Claims

Notice is hereby given that all people with potential claims for recovery from the TBIS Estate should file their claim with the Receiver so that it is actually submitted on the Receiver's online claim system, <http://tbis.io>, by **11:59 p.m. (Pacific Time) on August 11, 2021** (the "Bar Date"). Claims should be filed electronically through this online claim system.

Individuals or entities that believe they have good cause to either extend the Bar Date or to submit their claim by other means should request this from the Receiver at tbis@hkllaw.com no later than the Bar Date. Unless a claim is subject to a Receiver-granted exception, all claims against TBIS Estate assets that are not received by the Bar Date are barred.

SOURCE TBIS Receivership Estate

Related Links

<http://tbis.io>

From: tbis
Sent: Thursday, March 4, 2021 5:17 AM
Subject: RE: Notice of Claims Process and Claims Bar Date – Securities and Exchange Commission v. Titanium Blockchain Infrastructure Services, Inc.; EHI Internetwork and Systems Management, Inc. aka EHI-INSM, Inc.; and Michael Alan Stollery aka Michael Stollaire
Attachments: TBIS - Notice of Claims Process and Claims Bar Date.pdf

IN THE UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF CALIFORNIA WESTERN DIVISION

Securities and Exchange Commission v. Titanium Blockchain Infrastructure Services, Inc.; EHI Internetwork and Systems Management, Inc. aka EHI-INSM, Inc.; and Michael Alan Stollery aka Michael Stollaire, Civil Action No. 18-cv-4315 DSF (JPRx)

NOTICE OF CLAIMS PROCESS AND CLAIMS BAR DATE

THIS NOTICE MAY AFFECT YOUR LEGAL RIGHTS. PLEASE READ IT CAREFULLY. AMONG OTHER THINGS, FAILURE TO TIMELY SUBMIT A CLAIM PURSUANT TO THE DIRECTIONS BELOW MAY RESULT IN YOUR CLAIM BEING BARRED FROM A DISTRIBUTION

TO POTENTIAL CLAIMANT:

ON MAY 30, 2018, THE ABOVE-CAPTIONED COURT ENTERED AN ORDER APPOINTING JOSIAS DEWEY AS RECEIVER FOR THE ESTATE OF TITANIUM BLOCKCHAIN INFRASTRUCTURE SERVICES ("TBIS ESTATE"). ON AUGUST 21, 2020, THE COURT ENTERED AN ORDER AUTHORIZING THE CLAIMS PROCESS AND BAR DATE, AS MODIFIED DECEMBER 15, 2020. COPIES OF THESE ORDERS AND OTHER INFORMATION REGARDING THIS CASE ARE AVAILABLE ON THE TBIS RECEIVERSHIP WEBSITE AT <http://tbis.io/>.

YOU ARE RECEIVING THIS NOTICE BECAUSE OUR RECORDS INDICATE YOU MAY HOLD A CLAIM AGAINST THE TBIS ESTATE. RECEIVING THIS NOTICE DOES NOT MEAN THAT YOU HOLD A CLAIM OR THAT YOUR CLAIM WILL BE ELIGIBLE FOR A DISTRIBUTION FROM THE TBIS ESTATE.

THE TBIS CASE

AS ALLEGED BY THE UNITED STATES SECURITIES AND EXCHANGE COMMISSION, TITANIUM PRESIDENT MICHAEL ALAN STOLLERY, A/K/A MICHAEL STOLLAIRE, LIED ABOUT BUSINESS RELATIONSHIPS WITH THE FEDERAL RESERVE AND DOZENS OF WELL-KNOWN FIRMS FOR PURPOSES OF PROMOTING AN INITIAL COIN OFFERING ("ICO"). TITANIUM'S WEBSITE CONTAINED FABRICATED TESTIMONIALS FROM THESE SUPPOSED CORPORATE CUSTOMERS. THESE FRAUDULENT STATEMENTS WERE USED TO PROMOTE THE ICO, WHICH STOLLAIRE ADVERTISED THROUGH VIDEOS AND SOCIAL MEDIA. THE SEC'S COMPLAINT CHARGED STOLLAIRE AND TITANIUM WITH VIOLATING SECTIONS 5(A), 5(C), AND 17(A) OF THE SECURITIES ACT OF 1933 AND SECTION 10(B) OF THE SECURITIES EXCHANGE ACT OF 1934 AND RULES 10B-5(A) AND 10B-5(C) THEREUNDER. THE COMPLAINT CHARGED ANOTHER STOLLAIRE COMPANY, EHI INTERNETWORK AND SYSTEMS MANAGEMENT INC., WITH VIOLATING SECTION 17(A) OF THE SECURITIES ACT AND SECTION 10(B) OF THE EXCHANGE ACT AND RULES 10B-5(A) AND 10B-5(C) THEREUNDER.

ELIGIBLE CLAIMANTS AND CLAIMS PROCESS

YOU MAY BE ELIGIBLE TO SUBMIT A CLAIM IF YOU: (I) ARE A CREDITOR OF TITANIUM; (II) DIRECTLY PURCHASED TITANIUM BAR (“BAR”) OR TBAR FROM TITANIUM; (III) PURCHASED BAR FROM A THIRD PARTY (OTHER THAN TITANIUM) PRIOR TO FEBRUARY 22, 2018, HELD SUCH BAR THROUGH FEBRUARY 22, 2018, RECEIVED TBAR FROM TITANIUM BY VIRTUE OF YOUR BAR HOLDINGS, AND HELD SUCH TBAR THROUGH MAY 29, 2018; OR (IV) PURCHASED TBAR FROM A THIRD PARTY (OTHER THAN TITANIUM) PRIOR TO MAY 29, 2018 AND HELD SUCH TBAR THROUGH MAY 29, 2018.

HOW DO I SUBMIT A CLAIM?

INFORMATION REGARDING THE CLAIMS PROCESS IS AVAILABLE ON THE RECEIVER’S WEBSITE, <https://tbis.io>, INCLUDING NECESSARY INSTRUCTIONS ON HOW TO SUBMIT A CLAIM THROUGH THE ONLINE CLAIM SYSTEM.

DEADLINE FOR SUBMITTING CLAIMS

NOTICE IS HEREBY GIVEN THAT ALL PEOPLE WITH POTENTIAL CLAIMS FOR RECOVERY FROM THE TBIS ESTATE SHOULD FILE THEIR CLAIM WITH THE RECEIVER SO THAT IT IS ACTUALLY SUBMITTED ON THE RECEIVER’S ONLINE CLAIM SYSTEM, [http://tbis.io/](http://tbis.io), by **11:59 p.m. (Pacific Time) on August 11, 2021** (THE “BAR DATE”). CLAIMS SHOULD BE FILED ELECTRONICALLY THROUGH THIS ONLINE CLAIM SYSTEM.

INDIVIDUALS OR ENTITIES THAT BELIEVE THEY HAVE GOOD CAUSE TO EITHER EXTEND THE BAR DATE OR TO SUBMIT THEIR CLAIM BY OTHER MEANS SHOULD REQUEST THIS FROM THE RECEIVER AT tbis@hklaw.com NO LATER THAN THE BAR DATE. UNLESS A CLAIM IS SUBJECT TO A RECEIVER-GRANTED EXCEPTION, ALL CLAIMS AGAINST TBIS ESTATE ASSETS THAT ARE NOT RECEIVED BY THE BAR DATE ARE BARRED.

**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

Securities and Exchange Commission v. Titanium Blockchain Infrastructure Services, Inc.; EHI Internetwork and Systems Management, Inc. aka EHI-INSM, Inc.; and Michael Alan Stollery aka Michael Stollaire, Civil Action No. 18-cv-4315 DSF (JPRx)

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As alleged by the United States Securities and Exchange Commission, Titanium President Michael Alan Stollery, a/k/a Michael Stollaire, lied about business relationships with the Federal Reserve and dozens of well-known firms for purposes of promoting an Initial Coin Offering ("ICO"). Titanium's website contained fabricated testimonials from these supposed corporate customers. These fraudulent statements were used to promote the ICO, which Stollaire advertised through videos and social media. The SEC's complaint charged Stollaire and Titanium with violating Sections 5(a), 5(c), and 17(a) of the Securities Act of 1933 and Section 10(b) of the Securities Exchange Act of 1934 and Rules 10b-5(a) and 10b-5(c) thereunder. The complaint charged another Stollaire company, EHI Internetwork and Systems Management Inc., with violating Section 17(a) of the Securities Act and Section 10(b) of the Exchange Act and Rules 10b-5(a) and 10b-5(c) thereunder.

Eligible Claimants and Claims Process

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**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

How Do I Submit a Claim?

Information regarding the claims process is available on the Receiver's website, <https://tbis.io>, including necessary instructions on how to submit a claim through the online claim system.

Deadline for Submitting Claims

NOTICE IS HEREBY GIVEN that all people with potential claims for recovery from the TBIS Estate should file their claim with the Receiver so that it is actually submitted on the Receiver's online claim system, <http://tbis.io/>, by **11:59 p.m. (Pacific Time) on August 11, 2021** (the "Bar Date"). Claims should be filed electronically through this online claim system.

Individuals or entities that believe they have good cause to either extend the Bar Date or to submit their claim by other means should request this from the Receiver at tbis@hklaw.com no later than the Bar Date. Unless a claim is subject to a Receiver-granted exception, all claims against TBIS Estate assets that are not received by the Bar Date are barred.

PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 400 South Hope St., 8th Floor, Los Angeles, California 90071.

On March 22, 2021, I served the document described as **RECEIVER’S NOTICE TO COURT REGARDING STATUS OF CLAIMS PROCESS AND CLAIMS BAR DATE** on the interested parties in this action as follows:

(BY Electronic Transfer to the CM/ECF System) In accordance with Federal Rules of Civil Procedure 5(d)(3) and Local Rule 5-4, I uploaded via electronic transfer a true and correct copy scanned into an electronic file in Adobe “pdf” format of the above-listed document(s) to the U.S. District Court Central District of California’s Electronic Case Filing (CM/ECF) system on this date.

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

Executed on March 22, 2021, Los Angeles, California.

/s/ Kristina S. Azlin
Kristina S. Azlin (SBN 235238)