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

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LODGED
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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 GORDON A.
GOLDSMITH

DECLARATION OF GORDON A. GOLDSMITH

I, Gordon A. Goldsmith, declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am employed by The Walt Disney Company (“Disney”) as Associate General Counsel. I make this declaration at the request of the United States Securities and Exchange Commission (“SEC”). The matters set forth below are based on information provided to me or others acting under my direction.

2. Commencing in on or about February 2018, the SEC requested that Disney provide it with information concerning Titanium Blockchain Infrastructure Services, Inc. (“TBIS”), EHI Internetwork and Systems Management, Inc. (“EHI”), Michael Stollaire aka Michael Stollery or Michael Stoller (“Stollaire”), Brian Tacoronte, Joseph Romero, David Rowley, and Russell Brown.

3. In response to the SEC’s request, I and others acting at my direction, made inquiries of those we believed might have access to responsive information, including those having access to records relating to vendor agreements, information technology (“IT”) vendors, employment information, and requests for permission to use Disney intellectual property.

4. No record of any agreements between Disney and TBIS or EHI was found and no one contacted was familiar with either entity.

5. No records were located indicating that TBIS, EHI, or Stollaire requested, or that Disney authorized, the use of Disney’s name or logo.

6. With respect to the page in a TBIS White Paper the SEC provided that contains the logos of numerous companies, including a purported logo of “Walt Disney,” The Walt Disney Company Employee Policy Manual provides: “Company logos, marks or names may not be used in conjunction with logos, marks or names of non-Company entities or businesses.”

7. The SEC provided purported testimonials for TBIS attributed to: (a) “David Rowley, Senior Unix Systems Administrator, The Walt Disney Company and eBay”; (b) “Russell Brown, Technical Analyst, Walt Disney Company”; (c) “Joseph

1 Romero, Technical Analyst/Engineering, The Walt Disney Company”; and (d) “Brian
2 Tacoronte, Infrastructure Manager, The Walt Disney Company.”

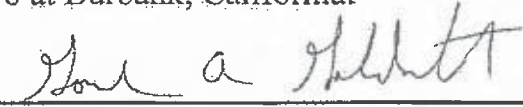
3 8. The records located for these individuals indicate that Messrs. Rowley,
4 Brown, and Romero worked as consultants or contractors for a third party IT vendor
5 that provided services to Disney. These records indicate that Mr. Rowley was
6 withdrawn from Disney on May 10, 2004; Mr. Brown was withdrawn from Disney
7 on May 20, 2004; and Mr. Romero was withdrawn from Disney on August 31, 2010.
8 No records were found indicating these individuals were employed by Disney.

9 9. The records located for Brian Tacoronte reflect that he was employed by
10 Disney Worldwide Services, Inc., and separated effective July 22, 2005.

11 10. No records were found relating to Stollaire.

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

14 Executed this 10th day of April, 2018 at Burbank, California.

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17 Gordon A. Goldsmith
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