

# BULKY DOCUMENT

(FILED ON PAPER – ENTIRE DOCUMENT EXCEEDS 100 PAGES)

Proceeding No.	92059944
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Filing Date	12/24/2015
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Part	1	of	1
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<b>92059944</b>
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STARK & STARK  
A Professional Corporation  
993 Lenox Drive, Bldg. 2  
Lawrenceville, NJ 08648-2389  
Phone: (609) 895-7346  
Fax: (609) 895-7395  
*Attorneys for Petitioners*

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of Trademark Registration No. 4,591,874 - 86116372  
For the Mark: Peoples Club of Nigeria International Service Mark  
Date registered: 08-26-2014

PEOPLES CLUB OF NIGERIA  
INTERNATIONAL (PCNI),  
PRINCETON JUNCTION BRANCH,  
PCNI CHICAGO, IL, PCNI MIAMI  
BRANCH,

Petitioners,

v.

PEOPLES CLUB OF NIGERIA  
INTERNATIONAL, INC., A New  
Jersey Corporation,

Registrant.

**NOTICE OF RELIANCE**

TO: Commissioner for Trademarks  
PO Box 1451  
Alexandria, VA 22313-1451

**Petitioners' Notice of Reliance**

Petitioners Peoples Club of Nigeria International ("PCNI") Princeton Junction branch,  
Chicago branch and Miami branch (collectively the "Petitioners") submit the following Notice of  
Reliance:



**12-24-2015**

1. Pursuant to T.B.M.P. 704.01, 704.07, 37 C.F.R. §2.122(e) and all applicable laws,

Petitioners hereby introduce into evidence the following official records:

<b>Document</b>	<b>Identifier (Bates stamp reference)</b>	<b>Relevance</b>
PCNI-Princeton Junction Branch, NJ Filing Certificate (dated December 4, 2006)	Petitioners 0009; attached hereto as Ex. "A"	Business registration document for Petitioner PCNI-Princeton Junction Branch
PCNI-Document Establishing Branch—PCNI Chicago (dated July 2007)	Petitioners 0014; attached hereto as Ex. "B"	Document indicating Petitioner PCNI-Chicago as established branch
PCNI, Inc., NJ Filing Certificate (dated August 18, 2010)	Petitioners 0037; attached hereto as Ex. "C"	Business registration document for Registrant PCNI, Inc.
PCNI, Inc. NJ Certificate of Incorporation, Nonprofit (dated August 18, 2010)	Petitioners 0048-49; attached hereto as Ex. "E"	Business registration document for Registrant PCNI, Inc.
PCNI-Document Establishing Branch—PCNI Miami (dated August 1998)	Petitioner 0161; attached hereto as Ex. "E"	Document indicating Petitioner PCNI-Miami as established branch
PCNI Miami Online Non Profit Corporation Detail Sheet (filed with the State of Florida)	Petitioner 0162-163; attached hereto as Ex. "F"	Document indicating Petitioner PCNI-Miami as Florida entity
Letter from the Office of the Secretary of State, State of Illinois Issuing Articles of Incorporation for PCNI-Chicago (dated January 20, 2006)	Petitioners 0167-169; attached hereto as Ex. "G"	Document indicating Petitioner PCNI-Chicago as Illinois entity
Letter from Secretary of State, State of Texas re PCN, USA (dated February 29, 2000) with attached Articles of Incorporation (filed February 29, 2000)	Petitioners 0170-173; attached hereto as Ex. "H"	Business registration document for PCN, USA.

2. Pursuant to TBMP 704.03, 704.04 and 37 C.F.R. §2.122(e) and all applicable laws, Petitioners hereby introduce into evidence copies of the following official records of the Patent and Trademark Office, copies of which are attached:

USPTO Trademark/Service Mark Application, TEAS Plus Application (filing date 11/12/13)	Exhibit "I"	Subject trademark application
USPTO Office Action (dated	Exhibit "J"	Office Action

2/27/14)		
Registrant's Response to Office Action (dated 4/9/14)	Exhibit "K"	Response to Office Action
USPTO Trademark Registration (Reg. No. 4,591,874)	Petitioners 0001-0002; attached hereto as Ex. "L"	Subject trademark registration
Petition to Cancel USPTO Filing Receipt (dated 9/16/14)	Exhibit "M"	Petition to Cancel Filing Receipt
Petition to Cancel	Exhibit "N"	Petition to Cancel
Answer in response to Petition to Cancel	Exhibit "O"	Answer in response to Petition to Cancel

3. Pursuant to 37 C.F.R. §2.120(j)(3)(i) and all applicable laws, Petitioners hereby introduce into evidence Registrants' Initial Written Disclosures with documents, attached hereto as Exhibit "P."

4. Pursuant to TBMP 704.10 and 37 C.F.R. §2.120(k) and all applicable laws, Petitioners hereby introduce into evidence Registrants' Answers and Objections to Petitioners' First Set of Interrogatories, together with the pertinent enclosures and documents Bates stamped (000001-000049) referenced therein. These Interrogatory responses, with documents, are attached as Exhibit "Q." By way of further clarification, Petitioners introduce the responses, and documents referenced in, Registrants' responses to request numbers 1 through 18. *See Kohler Co. v. Baldwin Hardware Corp.*, 82 U.S.P.Q.2d 1100, 1103 (TTAB 2007).

5. Pursuant to 37 C.F.R. §2.120(j)(1) and all applicable laws, Petitioners hereby designate and make part of the record of this case the following discovery deposition, together with exhibits introduced and referred to in the designated testimony:

Dr. Ambrose Mgbako Testimony (taken June 10, 2015) with Exhibits P-1 through P-3	Attached as Exhibit "R"
--	-------------------------

6. Pursuant to TBMP 704.08, Safer, Inc. v. OMS Investments, Inc., 94 U.S.P.Q. 2d 1031 (TTAB 2010) and all applicable laws, Petitioners hereby introduce into evidence the following internet materials:

<b>Document</b>	<b>Identifier (Bates stamp reference)</b>	<b>Relevance</b>
PCNI "Official Website"	Petitioners 0010-11; attached as Exhibit "S"	Demonstrates that Petitioners are recognized branches of PCNI as of April 27, 2015 at 11:50 a.m.
PCNI "Official Website"	Petitioners 0015-16; attached as Exhibit "T"	Demonstrates that Petitioners are recognized branches of PCNI as of March 3, 2015, at 11:14 a.m.

7. Pursuant to Trademark Rule 2.123, the following testimonial depositions were taken during Petitioners Testimony Period and will be timely filed with the Board, together with exhibits introduced and referred to in the designated testimony:

<b>Trial Deposition</b>	<b>Date of Deposition</b>
Dr. Ambrose Mgbako	December 2, 2015
Gordian Ndubizu	December 8, 2015
Dr. Anayo Ukeje	December 11, 2015

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that I have, on this 21<sup>st</sup> day of December 2015, delivered a true and accurate copy of the attached Notice of Reliance, via regular and electronic mail to the following:

Matthew H. Swyers, Esquire  
The Trademark Company  
344 Maple Ave. West, Suite 151  
Vienna, Virginia 22180  
*Attorneys for Registrant*

I, the undersigned, hereby certify that I have, on this 21<sup>st</sup> day of December 2015, delivered a true and accurate copy of the attached Notice of Reliance, via Certified Mail and electronic filing to the following:

Commissioner for Trademarks  
PO Box 1451  
Alexandria, VA 22313-1451

STARK & STARK  
A Professional Corporation

By: \_\_\_\_\_

CRAIG S. HILLIARD

STATE OF NEW JERSEY  
DEPARTMENT OF TREASURY  
FILING CERTIFICATION (CERTIFIED COPY)

PEOPLE'S CLUB OF NIGERIA INTERNATIONAL  
PRINCETON JUNCTION, NJ BRANCH INC.  
0100972745

*I, the Treasurer of the State of New Jersey,  
do hereby certify, that the above named business  
did file and record in this department a  
Certificate of Incorporation on December 4th, 2006  
and that the attached is a true copy of this  
document as the same is taken from and compared  
with the original(s) filed in this office and now  
remaining on file and of record.*

IN TESTIMONY WHEREOF, I have  
hereunto set my hand and  
affixed my Official Seal  
at Trenton, this  
19th day of December, 2006



*Bradley Abelow*

Bradley Abelow  
State Treasurer

PEOPLE CLUB OF NIGERIA INTERNATIONAL



Motto: Unity, Love And Service

Instrument Establishing A Branch

This is to certify that having been satisfied that provisions of section TWENTY of our constitution have been complied with a Branch of People's Club of Nigeria International is this 28<sup>th</sup> day of July ..... 2007 established at CHICAGO, IL...

Dated this 28<sup>th</sup> day of July ..... 2007

*[Signature]*  
Branch Chairman

*[Signature]*  
General Secretary

STATE OF NEW JERSEY  
DEPARTMENT OF THE TREASURY  
FILING CERTIFICATION (CERTIFIED COPY)

PEOPLE'S CLUB OF NIGERIA INTERNATIONAL, INC.  
0101010702

*I, the Treasurer of the State of New Jersey,  
do hereby certify, that the above named business  
did file and record in this department a  
Certificate of Incorporation on August 18th, 2010  
and that the attached is a true copy of this  
document as the same is taken from and compared  
with the original(s) filed in this office and now  
remaining on file and of record.*



*IN TESTIMONY WHEREOF, I have  
herewith set my hand and affixed  
my Official Seal at Trenton, this  
19th day of August, 2010*

A handwritten signature in black ink, appearing to read "Andrew P. Sidamon-Eristoff".

Andrew P Sidamon-Eristoff  
State Treasurer

Certificate Number: 117988376

Verify this certificate online at

[https://www.treasury.nj.gov/TYTR\\_Shop/ingCore/SP/Verify\\_Cert.jsp](https://www.treasury.nj.gov/TYTR_Shop/ingCore/SP/Verify_Cert.jsp)



**Division of Commercial Recording**  
**Certificate of Incorporation, Nonprofit**  
 (Title 15A:2-8 New Jersey Domestic Nonprofit Corporation Act)

NP  
**FILED** REG. 7/9  
 AUG 18 2010  
**STATE TREASURER**

This is to Certify that, there is hereby organized a corporation under and by virtue of the statute of the New Jersey Statutes.

1. Name of Corporation: **PEOPLE'S CLUB OF NIGERIA INTERNATIONAL, INC.** 0101010702
2. The purpose for which this corporation is organized is:  
**TO PROVIDE AND PROMOTE RECREATIONAL AND SOCIAL FACILITIES FOR ITS MEMBERS AND THE PUBLIC IN GENERAL**

3. Registered Agent's Name: **DR IDDI AMBROSE MGBAKO**
4. Registered Office/Address:  
 Street Address                      City                      State                      Zip  
**16 WRIGHT STREET                      EDISON                      NJ                      08820**

5. The corporation shall have members.  Yes.  No. If yes, qualification will be:  
 as set forth in the bylaws.  or as set forth herein (attach).
6. The rights and limitations of the different classes of members will be:  
 as set forth in the bylaws.  or as set forth herein (attach).
7. The method of electing trustees will be:  
 as set forth in the bylaws.  or as set forth herein (attach).
8. The first board of trustees shall consist of 4 trustees (Minimum of three. Addresses cannot be that of the corporation).

Name	Street Address	City	State	Zip
See attached.				

9. The duration of the corporation is: **PERPETUAL**
10. Set forth Name and Address of Incorporator(s) (Address cannot be that of the corporation. Need one or more.):

Name	Street Address	City	State	Zip
<b>SEBASTIAN O. IBEZIM, JR.</b>	<b>936 BROAD ST, 2<sup>ND</sup> FL.</b>	<b>NEWARK</b>	<b>NEW JERSEY,</b>	<b>07102</b>

11. Method of distribution of assets shall be:  as set forth in the bylaws.  or as set forth herein (attach)
12. Other provisions:

In Testimony whereof, each undersigned incorporators have caused this certificate to be signed this 17<sup>th</sup> day of AUGUST 2010

Signature:  Signature: \_\_\_\_\_  
 Signature: \_\_\_\_\_ Signature: \_\_\_\_\_

8. Continued. Names and addresses of first Board of Trustees.

Eze Desmond Ogugua  
15426 Devan Wood Drive  
Woodbridge, VA 22193

Ignatius Ojukwu-Ike  
8103 Autumn Trace Court  
Houston, Texas 77083-6943

Uchegbulem Aloysius Eze  
3626 Truesdale Drive  
Missouri City, Texas 77459

Prof. Innocent T. Aluka  
19526 Sedcreek Drive  
Katy, Texas 77449

PEOPLES CLUB OF NIGERIA



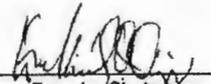
Motto: Unity And Love

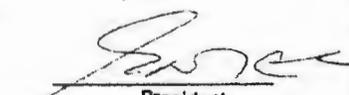
Instrument Establishing A Branch

This is to certify that having been satisfied that provisions of section TWENTY of our constitution have been complied with a Branch of People's Club of Nigeria is this 22<sup>nd</sup> day of AUGUST 1998 established at MIAMI, FLORIDA

Dated this 22<sup>nd</sup> day of AUGUST 1998

  
Secretary General

  
Branch Chairman

  
President



## Detail by Entity Name

### Florida Non Profit Corporation

PEOPLES CLUB OF NIGERIA INTERNATIONAL, INC. - MIAMI BRANCH

### Filing Information

Document Number	N02000006745
FEI/EIN Number	113651814
Date Filed	09/03/2002
State	FL
Status	ACTIVE
Last Event	REINSTATEMENT
Event Date Filed	04/30/2010
Event Effective Date	NONE

### Principal Address

2530 NW 131ST STREET  
MIAMI, FL 33167

Changed: 04/30/2008

### Mailing Address

2530 NW 131ST STREET  
MIAMI, FL 33167

Changed: 04/30/2008

### Registered Agent Name & Address

OBIESIE, EMMANUEL DR  
2530 NW 131ST STREET  
MIAMI, FL 33167

Name Changed: 04/30/2008

Address Changed: 04/30/2008

### Officer/Director Detail

#### **Name & Address**

Title DC

OBIESIE, EMMANUEL DR  
2530 NW 131ST STREET  
MIAMI, FL 33167

Title DFS

OSUJI, JUDE  
7373 NW 174TH TERRACE, #106  
MIAMI LAKES, FL 33015

Title D

OKPALA, EMMANUEL  
20050 NW 85 CT  
MIAMI, FL 33015

Title Director, Secretary

Miami, FL 33169

Title Director

Anam, Oliver O, Dr.  
966 NW 100 Ave  
Pembroke Pines, FL 33024

**Annual Reports**

Report Year	Filed Date
2012	04/27/2012
2013	04/30/2013
2014	04/30/2014

**Document Images**

<a href="#">04/30/2014 -- ANNUAL REPORT</a>	<a href="#">View image in PDF format</a>
<a href="#">04/30/2013 -- ANNUAL REPORT</a>	<a href="#">View image in PDF format</a>
<a href="#">04/27/2012 -- ANNUAL REPORT</a>	<a href="#">View image in PDF format</a>
<a href="#">04/26/2011 -- ANNUAL REPORT</a>	<a href="#">View image in PDF format</a>
<a href="#">04/30/2010 -- Reinstatement</a>	<a href="#">View image in PDF format</a>
<a href="#">04/30/2008 -- ANNUAL REPORT</a>	<a href="#">View image in PDF format</a>
<a href="#">05/16/2007 -- REINSTATEMENT</a>	<a href="#">View image in PDF format</a>
<a href="#">07/19/2005 -- ANNUAL REPORT</a>	<a href="#">View image in PDF format</a>
<a href="#">03/12/2004 -- ANNUAL REPORT</a>	<a href="#">View image in PDF format</a>
<a href="#">05/30/2003 -- ANNUAL REPORT</a>	<a href="#">View image in PDF format</a>
<a href="#">09/03/2002 -- Domestic Non-Profit</a>	<a href="#">View image in PDF format</a>



## OFFICE OF THE SECRETARY OF STATE

JESSE WHITE • Secretary of State

JANUARY 20, 2006

6471-558-5

ALEX CHINYERE OGOKE  
1954 W IRVING PARK RD  
CHICAGO, IL 60613

RE PEOPLES CLUB OF NIGERIA INTERNATIONAL CHICAGO, ILLINOIS

DEAR SIR OR MADAM:

ENCLOSED YOU WILL FIND THE ARTICLES OF INCORPORATION OF THE ABOVE NAMED CORPORATION. THE CORPORATION IS REQUIRED TO FILE AN ANNUAL REPORT EACH YEAR. BLANK FORMS WILL BE MAILED BY THIS OFFICE TO THE REGISTERED AGENT AS SHOWN BY OUR FILES APPROXIMATELY 60 DAYS PRIOR TO ITS ANNIVERSARY MONTH. (ORIGINAL DATE OF INCORPORATION).

THE REQUIRED FEE OF \$50.00 IN THIS CONNECTION HAS BEEN RECEIVED AND PLACED TO YOUR CREDIT.

THIS DOCUMENT MUST BE RECORDED IN THE OFFICE OF THE RECORDER OF THE COUNTY IN WHICH THE REGISTERED OFFICE OF THE CORPORATION IS LOCATED. FOR FURTHER INFORMATION CONTACT YOUR RECORDER OF DEEDS.

CERTAIN NOT FOR PROFIT CORPORATIONS ORGANIZED AS A CHARITABLE CORPORATION ARE REQUIRED TO REGISTER WITH THE OFFICE OF THE ATTORNEY GENERAL. UPON RECEIPT OF THE ENCLOSED ARTICLES OF INCORPORATION, YOU MUST CONTACT THE CHARITABLE TRUST DIVISION, OFFICE OF THE ATTORNEY GENERAL, 100 W. RANDOLPH, 3RD FLOOR, CHICAGO, ILLINOIS 60601 TELEPHONE (312) 814-2595.

THE ISSUANCE OF THE ARTICLES OF INCORPORATION DOES NOT ENTITLE THE CORPORATION TO A PROPERTY TAX EXEMPTION. YOU MUST APPLY FOR THAT EXEMPTION THROUGH THE BOARD OF REVIEW IN THE COUNTY WHERE THE REAL ESTATE IS LOCATED.

THE DEPARTMENT OF BUSINESS SERVICES IS NO LONGER ISSUING A CERTIFICATE ATTACHED TO THE ARTICLES OF INCORPORATION AS OF FEBRUARY 15, 2002.

SINCERELY,

JESSE WHITE  
SECRETARY OF STATE

DEPARTMENT OF BUSINESS SERVICES  
TELEPHONE (217) 782-6961

FORM NFP 102.10 (rev. Dec. 2003)  
 ARTICLES OF INCORPORATION  
 General Not For Profit Corporation Act

Jesse White, Secretary of State  
 Department of Business Services  
 Springfield, IL 62756  
 217-782-9522  
 www.cyberdriveillinois.com

Remit payment in the form of a cashier's



CP0908475

der or  
 :k

Jesse White Secretary of State

FILED: 1/20/2006

64715585

PHS

File #

Filing Fee: \$50

Approved: \_\_\_\_\_

----- Submit in duplicate ----- Type or Print clearly in black ink ----- Do not write above this line -----

Article 1. Name of Corporation: Peoples Club of Nigeria International Chicago, Illinois

Article 2. Name and Address of Initial Registered Agent and Registered Office:

Registered Agent Alex chinyere Ogoke, Esq.  
First Name Middle Name Last Name

Registered Office 1954 W. Irving Park Road  
Number Street Suite No. (P.O. Box alone is unacceptable)  
Chicago IL 60613 Cook  
City ZIP Code County

Article 3. The first Board of Directors shall be 3 in number, their Names and Addresses being as follows:  
Not less than three

Director Name	Street Address	City	State	ZIP Code
Alex Ogoke	1954 W. Irving park Road	Chicago	IL	60613
Ike Eziefule	1913 W. touhy Ave. #101	Chicago	IL	60626
Anayo Ukeje	1341 West Chase Ave. #101	Chicago	IL	60628

Article 4. Purposes for which the corporation is organized:

Charitable; Civic; Social Welfare and Social.

(continued on back)

WD  
 3

**Article 4.** (continued)

Is this corporation a Condominium Association as established under the Condominium Property Act? (check one)  
 Yes  No

Is this corporation a Cooperative Housing Corporation as defined in Section 216 of the Internal Revenue Code of 1954? (check one)  
 Yes  No

Is this corporation a Homeowner's Association, which administers a common-interest community as defined in subsection (c) of Section 9-102 of the Code of Civil Procedure? (check one)  
 Yes  No

**Article 5.** Other provisions (attach additional pages if needed):

**Article 6. Names & Addresses of Incorporators**

The undersigned incorporator(s) hereby declare(s), under penalties of perjury, that the statements made in the foregoing Articles of Incorporation are true.

Dated 1/18, 2006  
Month & Day Year

Signatures and Names	Post Office Address
1. <u><i>[Signature]</i></u> Signature <u>ALEX OGOKE</u> Name (please print)	1. <u>1954 W. Irving Park Road</u> Street <u>Chicago</u> IL 60613 City/Town State ZIP
2. <u><i>[Signature]</i></u> Signature <u>IKE EZIETULA</u> Name (please print)	2. <u>1913 W. Touhy Avenue, Unit 107</u> Street <u>Chicago</u> IL 60626 City/Town State ZIP
3. <u><i>[Signature]</i></u> Signature <u>ANAYO UKGJE</u> Name (please print)	3. <u>1341 W. Chase Avenue, Unit 101</u> Street <u>Chicago</u> IL 60626 City/Town State ZIP
4. _____ Signature Name (please print)	4. _____ Street City/Town State ZIP
5. _____ Signature Name (please print)	5. _____ Street City/Town State ZIP

**Signatures must be in BLACK INK on the original document.**

**Carbon copies, photocopies or rubber stamped signatures may only be used on the duplicate copy.**

- If a corporation acts as incorporator, the name of the corporation and the state of incorporation shall be shown and the execution shall be by a duly authorized corporate officer. Please print name and title under the officer's signature.
- The registered agent cannot be the corporation itself.
- The registered agent may be an individual, resident in Illinois, or a domestic or foreign corporation, authorized to act as a registered agent.
- The registered office may be, but need not be, the same as its principal office.
- A corporation that is to function as a club, as defined in Section 1-3.24 of the "Liquor Control Act" of 1934, must insert in its purpose clause a statement that it will comply with the State and local laws and ordinances relating to alcoholic liquors.

(For inserts use 8 1/2 x 11 white paper)

Corporations Section  
P.O.Box 13697  
Austin, Texas 78711-3697



Phil Wilson  
Secretary of State

## Office of the Secretary of State

The undersigned, as Secretary of State of Texas, does hereby certify that the attached is a true and correct copy of each document on file in this office as described below:

THE PEOPLES CLUB OF NIGERIA, USA  
Filing Number: 157204001

Articles Of Incorporation

February 29, 2000

In testimony whereof, I have hereunto signed my name officially and caused to be impressed hereon the Seal of State at my office in Austin, Texas on June 05, 2008.



A handwritten signature in cursive script that reads "Phil Wilson".

Phil Wilson  
Secretary of State

Phone: (512) 463-5555  
Prepared by: SDBHOYOZ

Come visit us on the internet at <http://www.sos.state.tx.us/>  
Fax: (512) 463-5709  
TID: 10266

Dial: 7-1-1 for Relay Services  
Document: 217804490002

Petitioners 0170

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**ARTICLES OF INCORPORATION  
OF  
THE PEOPLES CLUB OF NIGERIA, USA  
(A Non-Profit Corporation)**

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FILED  
In the Office of the  
Secretary of State of Texas  
FEB 29 2000  
Corporations Section

**ARTICLE ONE**

The name of the Corporation is THE PEOPLES CLUB OF NIGERIA,  
USA.

**ARTICLE TWO**

The Corporation is a non-profit corporation

**ARTICLE THREE**

The period of its duration is perpetual

**ARTICLE FOUR**

The Corporation is organized exclusively for charitable, religious, educational, or scientific purposes, including, for such purposes, the making of distributions to organizations that qualify as exempt organizations under section 501(c)(3) of the Internal Revenue Code, or the corresponding section of any future federal tax code, including, but not limited to, creating a social organization

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**ARTICLES OF INCORPORATION OF  
THE PEOPLES CLUB OF NIGERIA, USA, PAGE 1**

200029642018



**ARTICLE EIGHT**

Notwithstanding any other provision of these Articles, the Corporation shall not carry on any other activities not permitted to be carried on (a) by a corporation exempt from Federal Income Tax under Section 501(c)(3) of the Internal Revenue Code, or the corresponding provisions of any future Federal Tax Code, or (b) by a corporation, contributions to which are deductible under Section 170 (c)(2) of the Internal Revenue Code, or the corresponding section of any future Federal Tax Code

**ARTICLE NINE**

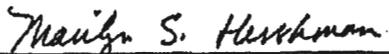
Upon the Dissolution of the Corporation, assets shall be distributed for one or more exempt purposes within the meaning of Section 501(c)(3) of the Internal Revenue Code, or the corresponding section of any future Federal Tax Code, or shall be distributed to the federal government, or to a state or local government, for a public purpose. Any such assets not so disposed of shall be disposed of by a court of competent jurisdiction of the county in which the principal office of the Corporation is then located, exclusively for such purposes or to such organization(s), as said Court shall determine, which are organized and operated for such purposes.

**ARTICLE TEN**

The name and address of the Incorporator is.

Marilyn S. Hershman  
408 W 17th Street, Suite 101  
Austin, Texas 78701-1207  
(512) 474-2002

IN WITNESS WHEREOF I have hereunto set my hand this 29th day of February, 2000

  
\_\_\_\_\_  
Marilyn S Hershman, Incorporator

## Trademark/Service Mark Application, Principal Register

### TEAS Plus Application

**Serial Number: 86116372**

**Filing Date: 11/12/2013**

***NOTE: Data fields with the \* are mandatory under TEAS Plus. The wording "(if applicable)" appears where the field is only mandatory under the facts of the particular application.***

**The table below presents the data as entered.**

Input Field	Entered
<b>TEAS Plus</b>	YES
<b>MARK INFORMATION</b>	
<b>*MARK</b>	\\TICRS\EXPORT16\IMAGEOUT 16\861\163\86116372\xml1\FTK0002.JPG
<b>*SPECIAL FORM</b>	YES
<b>USPTO-GENERATED IMAGE</b>	NO
<b>LITERAL ELEMENT</b>	PEOPLES CLUB OF NIGERIA INTERNATIONAL
<b>*COLOR MARK</b>	YES
<b>*COLOR(S) CLAIMED (If applicable)</b>	The color(s) black, blue, red, yellow is/are claimed as a feature of the mark.
<b>*DESCRIPTION OF THE MARK (and Color Location, if applicable)</b>	The mark consists of the black letters PEOPLES CLUB OF NIGERIA INTERNATIONAL above a blue circle bordered in black linked to a red circle bordered in black linked to a yellow circle bordered in black.
<b>PIXEL COUNT ACCEPTABLE</b>	YES
<b>PIXEL COUNT</b>	944 x 295
<b>REGISTER</b>	Principal
<b>APPLICANT INFORMATION</b>	
<b>*OWNER OF MARK</b>	Peoples Club of Nigeria International
<b>*STREET</b>	16 Wright St.

*CITY	Edison
*STATE (Required for U.S. applicants)	New Jersey
*COUNTRY	United States
*ZIP/POSTAL CODE (Required for U.S. applicants only)	08820
<b>LEGAL ENTITY INFORMATION</b>	
*TYPE	association
* STATE/COUNTRY WHERE LEGALLY ORGANIZED	Nigeria
<b>GOODS AND/OR SERVICES AND BASIS INFORMATION</b>	
*INTERNATIONAL CLASS	041
*IDENTIFICATION	Social club services, namely, arranging, organizing, and hosting social events, get-togethers, and parties for club members
*FILING BASIS	SECTION 1(a)
FIRST USE ANYWHERE DATE	At least as early as 00/00/1994
FIRST USE IN COMMERCE DATE	At least as early as 00/00/1994
<b>SPECIMEN FILE NAME(S)</b>	
ORIGINAL PDF FILE	<u>SPE0-9767147154-131702076 . filename-1.pdf</u>
CONVERTED PDF FILE(S) (1 page)	<u>\\TICRS\EXPORT16\IMAGEOUT16\861\163\86116372\xml1\FTK0003.JPG</u>
SPECIMEN DESCRIPTION	letterhead
<b>ADDITIONAL STATEMENTS SECTION</b>	
*TRANSLATION (if applicable)	
*TRANSLITERATION (if applicable)	
*CLAIMED PRIOR REGISTRATION (if applicable)	
*CONSENT (NAME/LIKENESS)	

<b>(if applicable)</b>	
<b>*CONCURRENT USE CLAIM (if applicable)</b>	
<b>DISCLAIMER</b>	No claim is made to the exclusive right to use "Nigeria" apart from the mark as shown.
<b>ATTORNEY INFORMATION</b>	
<b>NAME</b>	Matthew H. Swyers, Esq.
<b>FIRM NAME</b>	The Trademark Company
<b>STREET</b>	344 Maple Ave. West, Suite 151
<b>CITY</b>	Vienna
<b>STATE</b>	Virginia
<b>COUNTRY</b>	United States
<b>ZIP/POSTAL CODE</b>	22180
<b>PHONE</b>	1-800-906-8626
<b>FAX</b>	1-877-351-5480
<b>EMAIL ADDRESS</b>	info@thetrademarkcompany.com
<b>AUTHORIZED TO COMMUNICATE VIA EMAIL</b>	Yes
<b>CORRESPONDENCE INFORMATION</b>	
<b>*NAME</b>	Matthew H. Swyers, Esq.
<b>FIRM NAME</b>	The Trademark Company
<b>*STREET</b>	344 Maple Ave. West, Suite 151
<b>*CITY</b>	Vienna
<b>*STATE (Required for U.S. applicants)</b>	Virginia
<b>*COUNTRY</b>	United States
<b>*ZIP/POSTAL CODE</b>	22180
<b>PHONE</b>	1-800-906-8626
<b>FAX</b>	1-877-351-5480
<b>*EMAIL ADDRESS</b>	info@thetrademarkcompany.com
<b>*AUTHORIZED TO COMMUNICATE VIA</b>	Yes

<b>EMAIL</b>	
<b>FEE INFORMATION</b>	
<b>NUMBER OF CLASSES</b>	1
<b>FEE PER CLASS</b>	275
<b>*TOTAL FEE PAID</b>	275
<b>SIGNATURE INFORMATION</b>	
<b>* SIGNATURE</b>	/Matthew H. Swyers/
<b>* SIGNATORY'S NAME</b>	Matthew H. Swyers
<b>* SIGNATORY'S POSITION</b>	Attorney of Record
<b>SIGNATORY'S PHONE NUMBER</b>	1-800-906-8626
<b>* DATE SIGNED</b>	11/12/2013

---

## Trademark/Service Mark Application, Principal Register

### TEAS Plus Application

**Serial Number: 86116372**

**Filing Date: 11/12/2013**

#### To the Commissioner for Trademarks:

**MARK:** PEOPLES CLUB OF NIGERIA INTERNATIONAL (stylized and/or with design, see [mark](#))

The literal element of the mark consists of PEOPLES CLUB OF NIGERIA INTERNATIONAL. The color(s) black, blue, red, yellow is/are claimed as a feature of the mark. The mark consists of the black letters PEOPLES CLUB OF NIGERIA INTERNATIONAL above a blue circle bordered in black linked to a red circle bordered in black linked to a yellow circle bordered in black.

The applicant, Peoples Club of Nigeria International, a association legally organized under the laws of Nigeria, having an address of

16 Wright St.  
Edison, New Jersey 08820  
United States

requests registration of the trademark/service mark identified above in the United States Patent and Trademark Office on the Principal Register established by the Act of July 5, 1946 (15 U.S.C. Section 1051 et seq.), as amended, for the following:

**For specific filing basis information for each item, you must view the display within the Input Table.**

International Class 041: Social club services, namely, arranging, organizing, and hosting social events, get-togethers, and parties for club members

In International Class 041, the mark was first used by the applicant or the applicant's related company or licensee predecessor in interest at least as early as 00/00/1994, and first used in commerce at least as early as 00/00/1994, and is now in use in such commerce. The applicant is submitting one(or more) specimen(s) showing the mark as used in commerce on or in connection with any item in the class of listed goods and/or services, consisting of a(n) letterhead.

#### **Original PDF file:**

[SPE0-9767147154-131702076 . filename-1.pdf](#)

**Converted PDF file(s)** (1 page)

[Specimen File1](#)

No claim is made to the exclusive right to use "Nigeria" apart from the mark as shown.

The applicant's current Attorney Information:

Matthew H. Swyers, Esq. of The Trademark Company  
344 Maple Ave. West, Suite 151  
Vienna, Virginia 22180  
United States

The applicant's current Correspondence Information:

Matthew H. Swyers, Esq.  
The Trademark Company  
344 Maple Ave. West, Suite 151  
Vienna, Virginia 22180  
1-800-906-8626(phone)  
1-877-351-5480(fax)  
info@thetrademarkcompany.com (authorized)

A fee payment in the amount of \$275 has been submitted with the application, representing payment for 1 class(es).

**Declaration**

The undersigned, being hereby warned that willful false statements and the like so made are punishable by fine or imprisonment, or both, under 18 U.S.C. Section 1001, and that such willful false statements, and the like, may jeopardize the validity of the application or any resulting registration, declares that he/she is properly authorized to execute this application on behalf of the applicant; he/she believes the applicant to be the owner of the trademark/service mark sought to be registered, or, if the application is being filed under 15 U.S.C. Section 1051(b), he/she believes applicant to be entitled to use such mark in commerce; to the best of his/her knowledge and belief no other person, firm, corporation, or association has the right to use the mark in commerce, either in the identical form thereof or in such near resemblance thereto as to be likely, when used on or in connection with the goods/services of such other person, to cause confusion, or to cause mistake, or to deceive; and that all statements made of his/her own knowledge are true; and that all statements made on information and belief are believed to be true.

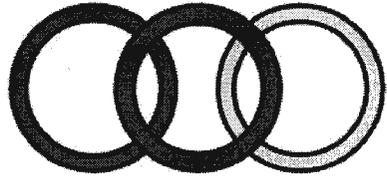
Signature: /Matthew H. Swyers/ Date Signed: 11/12/2013  
Signatory's Name: Matthew H. Swyers  
Signatory's Position: Attorney of Record

RAM Sale Number: 86116372  
RAM Accounting Date: 11/12/2013

Serial Number: 86116372  
Internet Transmission Date: Tue Nov 12 13:30:59 EST 2013

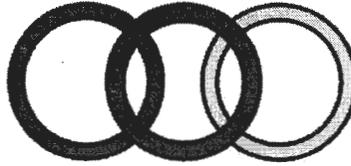
TEAS Stamp: USPTO/FTK-97.67.147.154-2013111213305958  
1554-86116372-500ef1a569a4eb1245882d374c  
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-CC-21819-20131112131702076350

# **PEOPLES CLUB OF NIGERIA INTERNATIONAL**



# PEOPLES CLUB OF NIGERIA INTERNATIONAL

REGISTERED IN NIGERIA  
REGISTERED IN UNITED STATES  
REGISTERED IN UNITED KINGDOM  
REGISTERED IN CANADA



## USA Address

16 Wright Street  
Edison, NJ 08820

## Headquarters

Onitsha/Owerrie Road  
P.O. Box 5421  
Onitsha, Anambra State  
NIGERIA

Chief F.A. Onwuachu  
Chairman, Management Committee  
Ichic P.D.C. Okechukwu  
General Secretary, Management Committee

## USA Branches

Houston  
Washington, DC  
Miami  
Princeton  
Galveston  
Dallas/Fort Worth  
Boston  
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Atlanta  
New York  
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San Francisco  
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Chicago  
Arlington  
New Haven  
Los Angeles  
San Antonio  
Virginia Beach  
Austin Texas

*Info@TheTrademarkCompany.com*  
*Attn: NEW MARK DESIGN*

## Canada

Toronto Branch

## United Kingdom

London Branch

Governing Council: HRH Igwe P.C. Ezenwa, Chairman

**To:** Peoples Club of Nigeria International ([info@thetrademarkcompany.com](mailto:info@thetrademarkcompany.com))  
**Subject:** U.S. TRADEMARK APPLICATION NO. 86116372 - PEOPLES CLUB OF NIGERIA - N/A  
**Sent:** 2/27/2014 4:46:05 PM  
**Sent As:** ECOM109@USPTO.GOV  
**Attachments:** [Attachment - 1](#)  
[Attachment - 2](#)  
[Attachment - 3](#)  
[Attachment - 4](#)  
[Attachment - 5](#)  
[Attachment - 6](#)  
[Attachment - 7](#)  
[Attachment - 8](#)

**UNITED STATES PATENT AND TRADEMARK OFFICE (USPTO)  
OFFICE ACTION (OFFICIAL LETTER) ABOUT APPLICANT'S TRADEMARK APPLICATION**

U.S. APPLICATION SERIAL NO. 86116372

MARK: PEOPLES CLUB OF NIGERIA

**\*86116372\***

**CORRESPONDENT ADDRESS:**

MATTHEW H. SWYERS, ESQ.  
THE TRADEMARK COMPANY  
344 MAPLE AVE W STE 151  
VIENNA, VA 22180-5612

**CLICK HERE TO RESPOND TO**  
<http://www.uspto.gov/trademarks/teas/r>

APPLICANT: Peoples Club of Nigeria International

CORRESPONDENT'S REFERENCE/DOCKET NO :

N/A

CORRESPONDENT E-MAIL ADDRESS:

[info@thetrademarkcompany.com](mailto:info@thetrademarkcompany.com)

**OFFICE ACTION**

**STRICT DEADLINE TO RESPOND TO THIS LETTER**

TO AVOID ABANDONMENT OF APPLICANT'S TRADEMARK APPLICATION, THE USPTO MUST RECEIVE APPLICANT'S COMPLETE RESPONSE TO THIS LETTER **WITHIN 6 MONTHS** OF THE ISSUE/MAILING DATE BELOW.

## **ISSUE/MAILING DATE: 2/27/2014**

The referenced application has been reviewed by the assigned trademark examining attorney. Applicant must respond timely and completely to the issue(s) below. 15 U.S.C. §1062(b); 37 C.F.R. §§2.62(a), 2.65(a); TMEP §§711, 718.03.

## **SEARCH RESULTS**

The trademark examining attorney has searched the Office's database of registered and pending marks and has found no conflicting marks that would bar registration under Trademark Act Section 2(d). TMEP §704.02; *see* 15 U.S.C. §1052(d).

## **SUMMARY OF ISSUES that applicant must address:**

- Specimen Requirement
- Disclaimer Requirement
- Clarification of Entity Information Requirement

## **SPECIMEN REQUIREMENT**

The specimen is not acceptable because the mark on the drawing differs from the mark on the specimen, and because it fails to create an association between the applied-for mark and the identified services.

### ***Mark Differs on Drawing and Specimen***

Registration is refused because the specimen does not show the applied-for mark in the drawing in use in commerce. 15 U.S.C. §§1051, 1127; 37 C.F.R. §§2.34(a)(1)(iv), 2.56(a); TMEP §§904, 904.07(a). Specifically, the specimen displays the mark as PEOPLES CLUB OF NIGERIA INTERNATIONAL, followed by four lines of text and then a design of three interlocking rings; however, the drawing displays the mark as PEOPLES CLUB OF NIGERIA INTERNATIONAL immediately above the design of the three interlocking rings.

The drawing shows the mark sought to be registered, and must be a substantially exact representation of the mark as used on or in connection with the goods and/or services, as shown by the specimen. 37 C.F.R. §2.51(a); TMEP §807.12(a). Because the mark in the drawing is not a substantially exact representation of the mark on the specimen, applicant has failed to provide the required evidence of use of the applied-for mark in commerce on or in connection with applicant's goods and/or services. *See* TMEP §807.12(a).

An application based on Trademark Act Section 1(a) must include a specimen showing the applied-for mark in use in commerce for each international class of goods and/or services identified in the application or amendment to allege use. 15 U.S.C. §1051(a)(1); 37 C.F.R. §§2.34(a)(1)(iv), 2.56(a); TMEP §§904, 904.07(a).

Regarding whether applicant may submit an amended drawing in response to this refusal, applicant is advised that the drawing of a mark can be amended only if the amendment does not materially alter the mark as originally filed. 37 C.F.R. §2.72(a)(2); *see* TMEP §§807.12(a), 807.14 *et seq.* In this case, amending the mark in the drawing to conform to the mark on the specimen would be a material alteration and would not be accepted, because the difference between the mark in the specimen and the drawing is significant and each mark creates a different commercial impression. Specifically, the commercial

impression of the mark on the specimen and the mark in the drawing differ because of the additional four lines of text that appear on the specimen between the literal element and the design element of the applied-for mark.

### ***Specimen Does Not Create Association Between Mark and Services***

Registration is also refused because the specimen does not show a direct association between the applied-for mark and the identified services; thus the specimen fails to show the applied-for mark in use in commerce. 15 U.S.C. §§1051, 1127; 37 C.F.R. §§2.34(a)(1)(iv), 2.56(a); TMEP §§904, 904.07(a).

Specimens consisting of advertising or promotional materials generally must show a direct association between the mark and the services for which registration is sought. *See In re Universal Oil Prods. Co.*, 476 F.2d 653, 655, 177 USPQ 456, 457 (C.C.P.A. 1973); *In re HSB Solomon Assocs.*, 102 USPQ2d 1269, 1274 (TTAB 2012); TMEP §1301.04(b). While the exact nature of the services does not need to be specified in the specimen, there must be something which creates in the mind of the purchaser an association between the mark and the service. *In re Adair*, 45 USPQ2d 1211, 1215 (TTAB 1997) (quoting *In re Johnson Controls Inc.*, 33 USPQ2d 1318, 1320 (TTAB 1994)); *see In re Osmotica Holdings, Corp.*, 95 USPQ2d 1666, 1668 (TTAB 2010).

In the present case, the specimen is a piece of letterhead that has the applied-for mark at the top, addresses for applicant's headquarters, and a listing of applicant's various branches. The specimen makes no reference – general or otherwise – to applicant's social club services. Letterhead that bears only the mark and a company name and address are not adequate specimens (unless the mark itself has a descriptive portion that refers to the service), because they do not show that the mark is used in the sale or advertising of the particular services recited in the application. *In re Monograms America, Inc.*, 51 USPQ2d 1317 (TTAB 1999) (letterhead specimen showing the mark MONOGRAMS AMERICA and the wording "A Nationwide Network of Embroidery Stores" held insufficient to support registration for consulting services for embroidery stores). TMEP §1301.04(c).

Examples of specimens for services may include advertising and marketing materials, brochures, photographs of business signage and billboards, and website printouts that show the mark used in the actual sale, rendering, or advertising of the services. *See* TMEP §§1301.04 *et seq.*

Applicant may respond to the specimen refusal by satisfying one of the following:

- (1) Submit a different specimen (a verified "substitute" specimen) that (a) was in actual use in commerce at least as early as the filing date of the application or prior to the filing of an amendment to allege use and (b) shows the applied-for mark in actual use in commerce for the goods and/or services identified in the application.
- (2) Amend the filing basis to intent to use under Section 1(b), for which no specimen is required. This option will later necessitate additional fee(s) and filing requirements such as providing a specimen at a subsequent date.

For an overview of *both* response options referenced above and instructions on how to satisfy either option online using the Trademark Electronic Application System (TEAS) form, please go to [http://www.uspto.gov/trademarks/law/J3\\_1.jsp](http://www.uspto.gov/trademarks/law/J3_1.jsp).

To submit a verified specimen online using the Trademark Electronic Application System (TEAS),

applicant should do the following: (1) answer “yes” to the TEAS response form wizard question to “submit a new or substitute specimen,” (2) attach a jpg or pdf file of the specimen, (3) describe what the specimen consists of, and (4) select the statement that “The substitute (or new, if appropriate) specimen(s) was/were in use in commerce at least as early as the filing date of the application.” These steps appear on different pages of the TEAS response form.

## DISCLAIMER REQUIREMENT

Applicant must disclaim the descriptive wording “CLUB OF NIGERIA INTERNATIONAL” apart from the mark as shown because it merely describes an ingredient, quality, characteristic, function, feature, purpose, or use of applicant’s goods and/or services. See 15 U.S.C. §§1052(e)(1), 1056(a); *DuoProSS Meditech Corp. v. Inviro Med. Devices, Ltd.*, 695 F.3d 1247, 1251, 103 USPQ2d 1753, 1755 (Fed. Cir. 2012) (quoting *In re Oppedahl & Larson LLP*, 373 F.3d 1171, 1173, 71 USPQ2d 1370, 1371 (Fed. Cir. 2004)); *In re Steelbuilding.com*, 415 F.3d 1293, 1297, 75 USPQ2d 1420, 1421 (Fed. Cir. 2005); TMEP §§1213, 1213.03(a).

In the application, applicant voluntarily disclaimed NIGERIA. However, applicant must also disclaim CLUB and INTERNATIONAL. “Club” is defined in relevant part as an organization for people who have a common interest in a particular activity or subject. See the attached evidence from Macmillan Dictionary. Applicant’s identified services are social club services, and, as shown by the attached screenshot from applicant’s website, applicant provides a club to unite Nigerians for social interaction. Therefore, the wording merely describes features or the purpose of applicant’s services. In addition, the wording “International” is simply a business designation that serves no source-identifying function. Business entity designations such as “Corporation,” “Inc.,” “Company,” and “Ltd.” merely indicate applicant’s entity type and generally do not function to indicate the source of goods or services. see, e.g., *Goodyear’s India Rubber Glove Mfg. Co. v. Goodyear Rubber Co.*, 128 U.S. 598, 602-03 (1888); *In re Patent & Trademark Servs., Inc.*, 49 USPQ2d 1537, 1539-40 (TTAB 1998); *In re The Paint Prods. Co.*, 8 USPQ2d 1863, 1866 (TTAB 1988). “International” means a company or organization that exists, works, or has members in more than one country. See the attached evidence from Macmillan Dictionary. Thus, consumers will not attribute a source indicating function to the wording INTERNATIONAL, but rather they will view it as identifying the nature of applicant’s business entity. Applicant may submit the following standardized format for a disclaimer:

**No claim is made to the exclusive right to use “CLUB OF NIGERIA INTERNATIONAL” apart from the mark as shown.**

TMEP §1213.08(a)(i); see *In re Owatonna Tool Co.*, 231 USPQ 493 (Comm’r Pats. 1983).

A “disclaimer” is a statement in the application record that applicant does not claim exclusive rights to an unregistrable component of a mark; a disclaimer of unregistrable matter does not affect the appearance of the mark or physically remove disclaimed matter from the mark. See *Schwarzkopf v. John H. Breck, Inc.*, 340 F.2d 978, 978, 144 USPQ 433, 433 (C.C.P.A. 1965); TMEP §1213. An unregistrable component of a mark includes wording and designs that are merely descriptive of an applicant’s goods and/or services. 15 U.S.C. §1052(e); see TMEP §§1209.03(f), 1213.03 *et seq.* Such words or designs need to be freely available for other businesses to market comparable goods or services and should not become the proprietary domain of any one party. See *Dena Corp. v. Belvedere Int’l, Inc.*, 950 F.2d 1555, 1560, 21 USPQ2d 1047, 1051 (Fed. Cir. 1991); *In re Aug. Storck KG*, 218 USPQ 823, 825 (TTAB 1983).

If applicant does not provide the required disclaimer, the USPTO may refuse to register the entire mark. *See In re Stereotaxis Inc.*, 429 F.3d 1039, 1041, 77 USPQ2d 1087, 1089 (Fed. Cir. 2005); TMEP §1213.01(b).

#### **CLARIFICATION OF ENTITY INFORMATION REQUIREMENT**

In the application, applicant identified its legal entity as an “association” organized in Nigeria. In addition to specifying the country under whose laws it is organized or exists, applicant must also indicate whether the association is incorporated or unincorporated. TMEP §803.03(c).

#### **ASSISTANCE**

If applicant has questions regarding this Office action, please telephone or e-mail the assigned trademark examining attorney. All relevant e-mail communications will be placed in the official application record; however, an e-mail communication will not be accepted as a response to this Office action and will not extend the deadline for filing a proper response. *See* 37 C.F.R. §2.191; TMEP §§304.01-.02, 709.04-.05. Further, although the trademark examining attorney may provide additional explanation pertaining to the refusal(s) and/or requirement(s) in this Office action, the trademark examining attorney may not provide legal advice or statements about applicant’s rights. *See* TMEP §§705.02, 709.06.

**TEAS PLUS APPLICANTS MUST SUBMIT DOCUMENTS ELECTRONICALLY OR SUBMIT FEE:** Applicants who filed their application online using the reduced-fee TEAS Plus application must continue to submit certain documents online using TEAS, including responses to Office actions. *See* 37 C.F.R. §2.23(a)(1). For a complete list of these documents, see TMEP §819.02(b). In addition, such applicants must accept correspondence from the Office via e-mail throughout the examination process and must maintain a valid e-mail address. 37 C.F.R. §2.23(a)(2); TMEP §§819, 819.02(a). TEAS Plus applicants who do not meet these requirements must submit an additional fee of \$50 per international class of goods and/or services. 37 C.F.R. §2.6(a)(1)(iv); TMEP §819.04. In appropriate situations and where all issues can be resolved by amendment, responding by telephone to authorize an examiner’s amendment will not incur this additional fee.

/Meredith Maresca/  
Trademark Examining Attorney  
Law Office 109  
(571) 272-8985  
meredith.maresca@uspto.gov

**TO RESPOND TO THIS LETTER:** Go to [http://www.uspto.gov/trademarks/teas/response\\_forms.jsp](http://www.uspto.gov/trademarks/teas/response_forms.jsp). Please wait 48-72 hours from the issue/ mailing date before using the Trademark Electronic Application System (TEAS), to allow for necessary system updates of the application. For *technical* assistance with online forms, e-mail [TEAS@uspto.gov](mailto:TEAS@uspto.gov). For questions about the Office action itself, please contact the assigned trademark examining attorney. **E-mail communications will not be accepted as responses to Office actions; therefore, do not respond to this Office action by e-mail.**

**All informal e-mail communications relevant to this application will be placed in the official application record.**

**WHO MUST SIGN THE RESPONSE:** It must be personally signed by an individual applicant or someone with legal authority to bind an applicant (i.e., a corporate officer, a general partner, all joint applicants). If an applicant is represented by an attorney, the attorney must sign the response.

**PERIODICALLY CHECK THE STATUS OF THE APPLICATION:** To ensure that applicant does not miss crucial deadlines or official notices, check the status of the application every three to four months using the Trademark Status and Document Retrieval (TSDR) system at <http://tsdr.uspto.gov/>. Please keep a copy of the TSDR status screen. If the status shows no change for more than six months, contact the Trademark Assistance Center by e-mail at [TrademarkAssistanceCenter@uspto.gov](mailto:TrademarkAssistanceCenter@uspto.gov) or call 1-800-786-9199. For more information on checking status, see <http://www.uspto.gov/trademarks/process/status/>.

**TO UPDATE CORRESPONDENCE/E-MAIL ADDRESS:** Use the TEAS form at <http://www.uspto.gov/trademarks/teas/correspondence.jsp>.

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# MACMILLAN DICTIONARY

Advertisement for Dove deodorant. Text: "Introducing Dove's Best Care Ever for the Ampit". Image of a Dove deodorant can. Text: "NEW Dove Advanced Care with NutriumMoisture". Logo: "CVS/pharmacy".

## club - definition

NOUN (COUNTABLE)  /kɪb/

- Menu**
- society for activity
  - place for entertainment
  - sports players and staff
  - place to relax
  - for buying at low price
  - suit of playing cards
  - for hitting ball in golf
  - stick used as weapon
- +phrase

[View thesaurus entry for club](#)  
[What are red words?](#)  
 [Using the thesaurus](#)

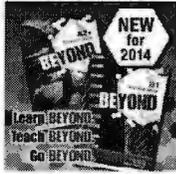
- Related dictionary definitions**
- club VERB
  - book club NOUN
  - club soda NOUN
  - fan club NOUN
  - golf club NOUN
  - lilly club NOUN
  - club class NOUN

??  
E??  
??

- an organization for people who have a common interest in a particular activity or subject  
*a sailing club*  
**join a club:** *I've joined the chess club.*  
**member of a club:** *Have you thought about becoming a member of our model airplane club?*  
**belong to a club:** *We both belong to the local tennis club.*  
 [Thesaurus entry for this meaning of club](#)
  - the place where the members of a club meet  
*We go to the club at least once a week.*  
 [Thesaurus entry for this meaning of club](#)
  - the people who belong to a club  
*The whole club is invited to their wedding.*  
 [Thesaurus entry for this meaning of club](#)

**Did you know?**  
Click any word in a definition or example to find the entry for that

word



- 2 a place you go to in the evening for entertainment  
*A new comedy club has opened downtown.*  
*This is an exclusive club for members only.*  
 Thesaurus entry for this meaning of club
  - a. a place you go to in the evening to dance and drink  
 Thesaurus entry for this meaning of club
- 3 a team of sports players and the staff who work with them  
*the Waterville baseball club*  
*a soccer club*  
 Thesaurus entry for this meaning of club
- 4 an organization that provides a place where its members, especially men, can go and eat, relax, or stay  
*a gentleman's club*  
 Thesaurus entry for this meaning of club
- 5 an organization that you join in order to buy something such as books or CDs that are sent to you by mail  
 Thesaurus entry for this meaning of club
- 6 a playing card with a pattern like three black balls on a black stem on it  
 Thesaurus entry for this meaning of club
  - a. clubs [PLURAL] the suit (=group) of playing cards that have a pattern like three black balls on a black stem on them. The other suits are diamonds, hearts, and spades  
*the king of clubs*  
 Thesaurus entry for this meaning of club
- 7 an object used for hitting the ball in golf  
 Thesaurus entry for this meaning of club
- 8 a thick heavy stick used as a weapon  
 Thesaurus entry for this meaning of club

PHRASE

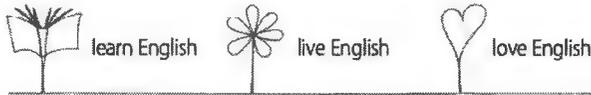
- **welcome to/join the club** SPOKEN  
used for telling someone that you understand an unpleasant situation they are in, because you are in the same situation  
*"I feel completely let down." "Join the club."*  
 Thesaurus entry for this meaning of club

This is the American English definition of club. [View British English definition of club.](#)  
[Change your default dictionary and thesaurus to British English.](#)  
[View the pronunciation for club.](#)

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Share this definition of club



### BuzzWord

#### sinkhole

a large, circular hole in the ground which suddenly appears because rock below has gradually been damaged or dissolved by water as it passes through the ground

BuzzWord Article

#### More BuzzWords

the Anthropocene fracking arbo  
biomimicry foot quake Frankenstein  
By gazing Higgs boson Diner!

[BuzzWord archive](#)

### Open Dictionary

#### executrix

a woman who is chosen by a person to execute his/her will  
[add a word](#)

#### More submissions

PET hunted took no-time  
sketcher prose talking lime  
executor face shiny pet sitting  
[like entries](#)

### Blog

A must for anyone with an interest in the changing face of language. The Macmillan Dictionary blog explores English as it is spoken around the world today.

[global English and language change from our blog](#)



### Word of the Day

#### contrite

very sorry or ashamed because you have done something bad

American definition of club from the online English dictionary from Macmillan Publishers Limited.



# PEOPLES CLUB OF NIGERIA INTERNATIONAL



OFFICIAL WEB SITE

UNITY, LOVE & SERVICE

INTERNATIONAL HEADQUARTERS,  
ONITSHA - QWERRI RD  
ONITSHA, ANAMBRA STATE  
NIGERIA



- Plain Menu
- Home
- PCNI News
- Members Business
- Private Messaging
- User Profile
- Job Listings
- World News
- Events Calendar
- Classifieds Ads
- Photo Gallery
- Polls
- Downloads
- Web Links
- Contact Us
- Officers
- AGM Report
- PCNI Videos
- Nigerian News
- PCNI Music
- PCNI Anthem
- Mini Calendar
- Feb 2014

### About Peoples Club of Nigeria International

Peoples club was formed in 1971 in Aba (Abia state of Nigeria) by a small group of individuals led by Chief Titus I. Urme-Ezeoke of blessed memory. It was a period of hopelessness following the devastation of the Nigeria civil war which ended in 1970. It was formed with the spirit of uniting people of like-minds, for social interaction. It was timely and it was well received because of it's founding principle of "be your brother's Keeper" embodied in it's motto: unity,love & Service  
Continue Reading >>>>



### MEMBERS LOG-IN

#### Spotlight



#### PCNI DISCUSSION



YAHOO! GROUPS  
REGISTER AND JOIN

PCNI MEMBERS ONLY

Asaba Convention 19...  
(2011/1/31)



Asaba Convenon 19...



Su Mo Tu We Th Fr Sa  
 1  
 2 3 4 5 6 7 8  
 9 10 11 12 13 14 15  
 16 17 18 19 20 21 22  
 23 24 25 26 27 28

Today

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**NigerianEvents**  
 FOR TRAVEL & POSTERS

# CHIEF DR EZE CELEBRATES PCNI PATRONSHIP IN STYLE



PCNI News and Information

- Chief Austin Ilodibe die... (2008/1/29)
- Oliver De Coque is dead! (2008/1/24)
- Chief Stephen Osita Osadi... (2007/5/21)



CHIEF BEN GINIGEME  
 OF DALLAS BRANCH  
 PASSES ON...



2010 AGM MEETING

PCNI Up Coming Events calendar  
 No Events



## PCNI World - Wide Branches

CLICK ON A BRANCH TO VISIT THEIR WEB SITE

ABA BRANCH	Poni Awka	Asaba Branch
ABUJA	ONITSHA	Benin City
Port Harcourt	BAUCHI BRANCH	Kano Branch
KADUNA	Owerri Branch	LAGOS BRANCH

AGM 2010 (2011/1/23)



AGM 2010 (2011/1/23)



AGM 2010 (2011/1/23)



AGM 2010 (2011/1/23)



PCNI Nigerian Links

- Nollywood Secrets (392)
- Go Naira (284)
- Nigerian Net (271)
- Nigerian Events (188)
- hostmelkor.net (104)

WATCH PCNI VIDEOS



Current Job Listings

View all Job Listings.



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Dictionary

# MACMILLAN DICTIONARY



## International - definition

NOUN [COUNTABLE]  /ɪnˈtɜːrˈnæʃ(ə)nəl/

[View thesaurus entry for international](#)  
[What are red words?](#)

- 1 a sports game between players or teams from different countries
  - 
  - a. someone who plays in an international sports game
    -
- 2 a company or organization that exists, works, or has members in more than one country
  -

### Related dictionary definitions

- international ADJECTIVE
- Amnesty International
- international relations NOUN
- international baccalaureate NOUN
- the international community NOUN
- the international date line NOUN

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Click any word in a definition or example to find the entry for that word



**MACMILLAN LIFE SKILLS**  
ESSENTIALS TO A LIFE WELL LIVED



learn English



live English



love English



### BuzzWord

#### sinkhole

a large, circular hole in the ground which suddenly appears because rock below has gradually been damaged or dissolved by water as it passes through the ground

[BuzzWord Article](#)



### Open Dictionary

#### executrix

a woman who is chosen by a person to execute his/her will

[add a word](#)



### Word of the Day

#### contrite

very sorry or ashamed because you have done something bad

### Blog

A must for anyone with an interest in the changing face of language. The Macmillan Dictionary blog explores English as it is spoken around the world today.

[global English and language change from our blog](#)

American definition of international from the online English dictionary from Macmillan Publishers Limited.



**To:** Peoples Club of Nigeria International ([info@thetrademarkcompany.com](mailto:info@thetrademarkcompany.com))  
**Subject:** U.S. TRADEMARK APPLICATION NO. 86116372 - PEOPLES CLUB OF NIGERIA - N/A  
**Sent:** 2/27/2014 4:46:06 PM  
**Sent As:** ECOM109@USPTO.GOV  
**Attachments:**

**UNITED STATES PATENT AND TRADEMARK OFFICE (USPTO)**

**IMPORTANT NOTICE REGARDING YOUR  
U.S. TRADEMARK APPLICATION**

USPTO OFFICE ACTION (OFFICIAL LETTER) HAS ISSUED  
ON **2/27/2014** FOR U.S. APPLICATION SERIAL NO. 86116372

Please follow the instructions below:

**(1) TO READ THE LETTER:** Click on this [link](#) or go to <http://tsdr.uspto.gov>, enter the U.S. application serial number, and click on "Documents."

The Office action may not be immediately viewable, to allow for necessary system updates of the application, but will be available within 24 hours of this e-mail notification.

**(2) TIMELY RESPONSE IS REQUIRED:** Please carefully review the Office action to determine (1) how to respond, and (2) the applicable response time period. Your response deadline will be calculated from **2/27/2014** (*or sooner if specified in the Office action*). For information regarding response time periods, see <http://www.uspto.gov/trademarks/process/status/responsetime.jsp>.

**Do NOT hit "Reply" to this e-mail notification, or otherwise e-mail your response** because the USPTO does NOT accept e-mails as responses to Office actions. Instead, the USPTO recommends that you respond online using the Trademark Electronic Application System (TEAS) response form located at [http://www.uspto.gov/trademarks/teas/response\\_forms.jsp](http://www.uspto.gov/trademarks/teas/response_forms.jsp).

**(3) QUESTIONS:** For questions about the contents of the Office action itself, please contact the assigned trademark examining attorney. For *technical* assistance in accessing or viewing the Office action in the Trademark Status and Document Retrieval (TSDR) system, please e-mail [TSDR@uspto.gov](mailto:TSDR@uspto.gov).

**WARNING**

**Failure to file the required response by the applicable response deadline will result in the**

**ABANDONMENT of your application.** For more information regarding abandonment, see <http://www.uspto.gov/trademarks/basics/abandon.jsp>.

**PRIVATE COMPANY SOLICITATIONS REGARDING YOUR APPLICATION:** Private companies **not** associated with the USPTO are using information provided in trademark applications to mail or e-mail trademark-related solicitations. These companies often use names that closely resemble the USPTO and their solicitations may look like an official government document. Many solicitations require that you pay “fees.”

Please carefully review all correspondence you receive regarding this application to make sure that you are responding to an official document from the USPTO rather than a private company solicitation. All official USPTO correspondence will be mailed only from the “United States Patent and Trademark Office” in Alexandria, VA; or sent by e-mail from the domain “@uspto.gov.” For more information on how to handle private company solicitations, see [http://www.uspto.gov/trademarks/solicitation\\_warnings.jsp](http://www.uspto.gov/trademarks/solicitation_warnings.jsp).

## Response to Office Action

**The table below presents the data as entered.**

Input Field	Entered
<b>SERIAL NUMBER</b>	86116372
<b>LAW OFFICE ASSIGNED</b>	LAW OFFICE 109
<b>MARK SECTION (no change)</b>	
<b>LEGAL ENTITY SECTION (current)</b>	
<b>TYPE</b>	association
<b>STATE/COUNTRY WHERE LEGALLY ORGANIZED</b>	NG
<b>LEGAL ENTITY SECTION (proposed)</b>	
<b>TYPE</b>	corporation
<b>STATE/COUNTRY OF INCORPORATION</b>	Nigeria
<b>GOODS AND/OR SERVICES SECTION (current)</b>	
<b>INTERNATIONAL CLASS</b>	041
<b>DESCRIPTION</b>	
Social club services, namely, arranging, organizing, and hosting social events, get-togethers, and parties for club members	
<b>FILING BASIS</b>	Section 1(a)
<b>FIRST USE ANYWHERE DATE</b>	At least as early as 00/00/1994
<b>FIRST USE IN COMMERCE DATE</b>	At least as early as 00/00/1994
<b>GOODS AND/OR SERVICES SECTION (proposed)</b>	
<b>INTERNATIONAL CLASS</b>	041
<b>DESCRIPTION</b>	
Social club services, namely, arranging, organizing, and hosting social events, get-togethers, and parties for club members	
<b>FILING BASIS</b>	Section 1(a)
<b>FIRST USE ANYWHERE DATE</b>	At least as early as 00/00/1994
<b>FIRST USE IN COMMERCE DATE</b>	At least as early as 00/00/1994

STATEMENT TYPE	"The substitute (or new, if appropriate) specimen(s) was/were in use in commerce at least as early as the filing date of the application" [for an application based on Section 1(a), Use in Commerce] OR "The substitute (or new, if appropriate) specimen(s) was/were in use in commerce prior either to the filing of the Amendment to Allege Use or expiration of the filing deadline for filing a Statement of Use" [for an application based on Section 1(b) Intent-to-Use].
SPECIMEN FILE NAME(S)	\\TICRS\EXPORT16\IMAGEOUT 16\861\163\86116372\xml6\ ROA0002.JPG
SPECIMEN DESCRIPTION	Flier advertising club
<b>ADDITIONAL STATEMENTS SECTION</b>	
DISCLAIMER	No claim is made to the exclusive right to use CLUB OF NIGERIA INTERNATIONAL apart from the mark as shown.
<b>SIGNATURE SECTION</b>	
DECLARATION SIGNATURE	/Matthew H. Swyers/
SIGNATORY'S NAME	Matthew H. Swyers
SIGNATORY'S POSITION	Attorney of Record
SIGNATORY'S PHONE NUMBER	800-906-8626 x100
DATE SIGNED	04/09/2014
RESPONSE SIGNATURE	/Matthew H. Swyers/
SIGNATORY'S NAME	Matthew H. Swyers
SIGNATORY'S POSITION	Attorney of Record
SIGNATORY'S PHONE NUMBER	800-906-8626 x100
DATE SIGNED	04/09/2014
AUTHORIZED SIGNATORY	YES
<b>FILING INFORMATION SECTION</b>	
SUBMIT DATE	Wed Apr 09 15:13:46 EDT 2014
TEAS STAMP	USPTO/ROA-97.67.147.154-2 0140409151346993964-86116 372-50078b2aafcd15404828 5f90e0a9aa26be0ce2d749d8b 0212a8aab199f2264d8-N/A-N /A-20140409150801932050

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**Response to Office Action**  
**To the Commissioner for Trademarks:**

Application serial no. **86116372** has been amended as follows:

**CLASSIFICATION AND LISTING OF GOODS/SERVICES**

**Applicant proposes to amend the following class of goods/services in the application:**

**Current:** Class 041 for Social club services, namely, arranging, organizing, and hosting social events, get-togethers, and parties for club members

Original Filing Basis:

**Filing Basis: Section 1(a), Use in Commerce:** The applicant is using the mark in commerce, or the applicant's related company or licensee is using the mark in commerce, on or in connection with the identified goods and/or services. 15 U.S.C. Section 1051(a), as amended. The mark was first used at least as early as 00/00/1994 and first used in commerce at least as early as 00/00/1994, and is now in use in such commerce.

**Proposed:** Class 041 for Social club services, namely, arranging, organizing, and hosting social events, get-togethers, and parties for club members

**Filing Basis: Section 1(a), Use in Commerce:** The applicant is using the mark in commerce, or the applicant's related company or licensee is using the mark in commerce, on or in connection with the identified goods and/or services. 15 U.S.C. Section 1051(a), as amended. The mark was first used at least as early as 00/00/1994 and first used in commerce at least as early as 00/00/1994, and is now in use in such commerce.

Applicant hereby submits one(or more) specimen(s) for Class 041. The specimen(s) submitted consists of Flier advertising club.

**"The substitute (or new, if appropriate) specimen(s) was/were in use in commerce at least as early as the filing date of the application" [for an application based on Section 1(a), Use in Commerce] OR "The substitute (or new, if appropriate) specimen(s) was/were in use in commerce prior either to the filing of the Amendment to Allege Use or expiration of the filing deadline for filing a Statement of Use"**

*[for an application based on Section 1(b) Intent-to-Use].*

Specimen File1

**APPLICANT AND/OR ENTITY INFORMATION**

**Applicant proposes to amend the following:**

**Current:** Peoples Club of Nigeria International a(n) association, legally organized under the laws of NG, having an address of

16 Wright St.

Edison, New Jersey 08820

United States

**Proposed:** Peoples Club of Nigeria International, a corporation of Nigeria, having an address of  
16 Wright St.

Edison, New Jersey 08820  
United States

## **ADDITIONAL STATEMENTS**

### **Disclaimer**

No claim is made to the exclusive right to use CLUB OF NIGERIA INTERNATIONAL apart from the mark as shown.

## **SIGNATURE(S)**

### **Declaration Signature**

DECLARATION: The signatory being warned that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. Section 1001, and that such willful false statements and the like may jeopardize the validity of the application or submission or any registration resulting therefrom, declares that, if the applicant submitted the application or amendment to allege use (AAU) unsigned, all statements in the application or AAU and this submission based on the signatory's own knowledge are true, and all statements in the application or AAU and this submission made on information and belief are believed to be true.

STATEMENTS FOR UNSIGNED SECTION 1(a) APPLICATION/AAU: If the applicant filed an unsigned application under 15 U.S.C. Section 1051(a) or AAU under 15 U.S.C. Section 1051(c), the signatory additionally believes that: the applicant is the owner of the trademark/service mark sought to be registered; the applicant or the applicant's related company or licensee is using the mark in commerce and has been using the mark in commerce as of the filing date of the application or AAU on or in connection with the goods/services in the application or AAU, and such use by the applicant's related company or licensee inures to the benefit of the applicant; the original specimen(s), if applicable, shows the mark in use in commerce as of the filing date of the application or AAU on or in connection with the goods/services in the application or AAU; and to the best of the signatory's knowledge and belief, no other person has the right to use the mark in commerce, either in the identical form or in such near resemblance as to be likely, when used on or in connection with the goods/services of such other person, to cause confusion or mistake, or to deceive.

STATEMENTS FOR UNSIGNED SECTION 1(b)/SECTION 44 APPLICATION: If the applicant filed an unsigned application under 15 U.S.C. Section 1051(b), Section 1126(d), and/or Section 1126(e), the signatory additionally believes that: the applicant is entitled to use the mark in commerce; the applicant has a bona fide intention and has had a bona fide intention as of the application filing date to use or use through the applicant's related company or licensee the mark in commerce on or in connection with the goods/services in the application; and to the best of the signatory's knowledge and belief, no other person has the right to use the mark in commerce, either in the identical form or in such near resemblance as to be likely, when used on or in connection with the goods/services of such other person, to cause confusion or mistake, or to deceive.

Signature: /Matthew H. Swyers/    Date: 04/09/2014  
Signatory's Name: Matthew H. Swyers  
Signatory's Position: Attorney of Record  
Signatory's Phone Number: 800-906-8626 x100

### **Response Signature**

Signature: /Matthew H. Swyers/    Date: 04/09/2014

Signatory's Name: Matthew H. Swyers  
Signatory's Position: Attorney of Record

Signatory's Phone Number: 800-906-8626 x100

The signatory has confirmed that he/she is an attorney who is a member in good standing of the bar of the highest court of a U.S. state, which includes the District of Columbia, Puerto Rico, and other federal territories and possessions; and he/she is currently the applicant's attorney or an associate thereof; and to the best of his/her knowledge, if prior to his/her appointment another U.S. attorney or a Canadian attorney/agent not currently associated with his/her company/firm previously represented the applicant in this matter: (1) the applicant has filed or is concurrently filing a signed revocation of or substitute power of attorney with the USPTO; (2) the USPTO has granted the request of the prior representative to withdraw; (3) the applicant has filed a power of attorney appointing him/her in this matter; or (4) the applicant's appointed U.S. attorney or Canadian attorney/agent has filed a power of attorney appointing him/her as an associate attorney in this matter.

Serial Number: 86116372

Internet Transmission Date: Wed Apr 09 15:13:46 EDT 2014

TEAS Stamp: USPTO/ROA-97.67.147.154-2014040915134699

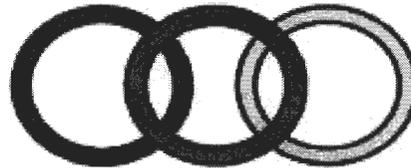
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0a9aa26be0ce2d749d8b0212a8aab199f2264d8-

N/A-N/A-20140409150801932050

# PEOPLES CLUB OF NIGERIA INTERNATIONAL

**USA Address**  
16 Wright Street  
Edison, NJ 08820



**Headquarters**  
Onitsha/Owerrie Road  
P.O. Box 5421  
Onitsha, Anambra State  
NIGERIA

**USA Branches**

Houston  
Washington,DC  
Princeton  
Galveston  
Dallas/ Fort Worth  
Boston  
Philadelphia  
Atlanta  
New York  
Cherry Hill  
San Francisco  
Arlington  
New Haven  
Los Angeles  
San Antonio  
Virginia Beach  
Austin Texas

*Motto : Unity, Love, Service*  
*A Social Club*

# United States of America

United States Patent and Trademark Office

## PEOPLES CLUB OF NIGERIA INTERNATIONAL



**Reg. No. 4,591,874**

**Registered Aug. 26, 2014**

**Int. Cl.: 41**

**SERVICE MARK**

**PRINCIPAL REGISTER**

PEOPLES CLUB OF NIGERIA INTERNATIONAL (NIGERIA CORPORATION)  
16 WRIGHT ST.  
EDISON, NJ 08820

FOR: SOCIAL CLUB SERVICES, NAMELY, ARRANGING, ORGANIZING, AND HOSTING SOCIAL EVENTS, GET-TOGETHERS, AND PARTIES FOR CLUB MEMBERS, IN CLASS 41 (U.S. CLS. 100, 101 AND 107).

FIRST USE 0-0-1994; IN COMMERCE 0-0-1994.

NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "CLUB OF NIGERIA INTERNATIONAL", APART FROM THE MARK AS SHOWN.

THE COLOR(S) BLACK, BLUE, RED, AND YELLOW IS/ARE CLAIMED AS A FEATURE OF THE MARK.

THE MARK CONSISTS OF THE BLACK LETTERS "PEOPLES CLUB OF NIGERIA INTERNATIONAL" ABOVE A BLUE CIRCLE BORDERED IN BLACK LINKED TO A RED CIRCLE BORDERED IN BLACK LINKED TO A YELLOW CIRCLE BORDERED IN BLACK.

SER. NO. 86-116,372, FILED 11-12-2013.

MEREDITH MARESCA, EXAMINING ATTORNEY



*Michelle K. Lee*

Deputy Director of the United States  
Patent and Trademark Office

**REQUIREMENTS TO MAINTAIN YOUR FEDERAL  
TRADEMARK REGISTRATION**

**WARNING: YOUR REGISTRATION WILL BE CANCELLED IF YOU DO NOT FILE THE  
DOCUMENTS BELOW DURING THE SPECIFIED TIME PERIODS.**

**Requirements in the First Ten Years\***

**What and When to File:**

***First Filing Deadline:*** You must file a Declaration of Use (or Excusable Nonuse) between the 5th and 6th years after the registration date. See 15 U.S.C. §§1058, 1141k. If the declaration is accepted, the registration will continue in force for the remainder of the ten-year period, calculated from the registration date, unless cancelled by an order of the Commissioner for Trademarks or a federal court.

***Second Filing Deadline:*** You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between the 9th and 10th years after the registration date.\*  
See 15 U.S.C. §1059.

**Requirements in Successive Ten-Year Periods\***

**What and When to File:**

You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between every 9th and 10th-year period, calculated from the registration date.\*

**Grace Period Filings\***

The above documents will be accepted as timely if filed within six months after the deadlines listed above with the payment of an additional fee.

**The United States Patent and Trademark Office (USPTO) will NOT send you any future notice or  
reminder of these filing requirements.**

**\*ATTENTION MADRID PROTOCOL REGISTRANTS:** The holder of an international registration with an extension of protection to the United States under the Madrid Protocol must timely file the Declarations of Use (or Excusable Nonuse) referenced above directly with the USPTO. The time periods for filing are based on the U.S. registration date (not the international registration date). The deadlines and grace periods for the Declarations of Use (or Excusable Nonuse) are identical to those for nationally issued registrations. See 15 U.S.C. §§1058, 1141k. However, owners of international registrations do not file renewal applications at the USPTO. Instead, the holder must file a renewal of the underlying international registration at the International Bureau of the World Intellectual Property Organization, under Article 7 of the Madrid Protocol, before the expiration of each ten-year term of protection, calculated from the date of the international registration. See 15 U.S.C. §1141j. For more information and renewal forms for the international registration, see <http://www.wipo.int/madrid/en/>.

**NOTE: Fees and requirements for maintaining registrations are subject to change. Please check the USPTO website for further information. With the exception of renewal applications for registered extensions of protection, you can file the registration maintenance documents referenced above online at <http://www.uspto.gov>.**



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## Electronic System for Trademark Trials and Appeals

### Receipt

Your submission has been received by the USPTO.  
The content of your submission is listed below.  
You may print a copy of this receipt for your records.

ESTTA Tracking number: **ESTTA627393**Filing date: **09/16/2014**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

### Petition for Cancellation

Notice is hereby given that the following parties request to cancel indicated registration.

#### Petitioner Information

<b>Name</b>	Peoples Club of Nigeria International Princeton Junction, NJ Branch, Inc.		
<b>Entity</b>	Corporation	<b>Citizenship</b>	New Jersey
<b>Address</b>	Post Office Box 642 Princeton Junction, NJ 08550 UNITED STATES		

<b>Name</b>	Peoples Club of Nigeria International-Miami Branch		
<b>Entity</b>	Corporation	<b>Citizenship</b>	Florida
<b>Address</b>	2530 NW 131 Street Miami, FL 33167 UNITED STATES		

<b>Name</b>	Peoples Club of Nigeria International-Chicago Branch		
<b>Entity</b>	Corporation	<b>Citizenship</b>	Illinois
<b>Address</b>	7717 Keeler Avenue Skokie, IL 60076 UNITED STATES		

--	--

<b>Attorney information</b>	Craig S. Hilliard Stark & Stark PC 993 Lenox Drive Bldg 2 Lawrenceville, NJ 08648 UNITED STATES chilliard@stark-stark.com Phone:6092197426
-----------------------------	---

**Registration Subject to Cancellation**

<b>Registration No</b>	4591874	<b>Registration date</b>	08/26/2014
<b>Registrant</b>	Peoples Club of Nigeria International 16 Wright St. Edison, NJ 08820 UNITED STATES		

**Goods/Services Subject to Cancellation**

Class 041. First Use: 1994/00/00 First Use In Commerce: 1994/00/00 All goods and services in the class are cancelled, namely: Social club services, namely, arranging, organizing, and hosting social events,get-togethers, and parties for club members
---

**Grounds for Cancellation**

<i>Torres v. Cantine Torresella S.r.l.</i> Fraud	808 F.2d 46, 1 USPQ2d 1483 (Fed. Cir. 1986)
--	---

<b>Attachments</b>	Ex A.pdf(33513 bytes ) Ex B.pdf(64956 bytes ) Ex C.pdf(20565 bytes ) Petition to Cancel_Final(1).pdf(49431 bytes )
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**Certificate of Service**

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by Overnight Courier on this date.

<b>Signature</b>	/csh/
<b>Name</b>	Craig S. Hilliard

<b>Date</b>	09/16/2014
-------------	------------

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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of Trademark Registration No. 4,591,874  
For the Mark: Peoples Club of Nigeria International Service Mark  
Date registered: 08-26-2014

PEOPLES CLUB OF NIGERIA  
INTERNATIONAL (PCNI),  
PRINCETON JUNCTION BRANCH,  
PCNI CHICAGO BRANCH, PCNI  
MIAMI BRANCH,

Petitioners,

v.

PEOPLES CLUB OF NIGERIA  
INTERNATIONAL, INC., A New  
Jersey Corporation,

Registrant.

**PETITION TO CANCEL**

The Petitioners are:

Peoples Club of Nigeria International – Princeton Junction Branch  
Post Office Box 642  
Princeton Junction, New Jersey 08550

Peoples Club of Nigeria International—Miami Branch  
2530 NW 131 Street  
Miami, Florida 33167

Peoples Club of Nigeria International—Chicago Branch  
7717 Keeler Avenue  
Skokie, Illinois 60076

To the best of Petitioners' knowledge, the name and address of the current owner of the registration is:

Peoples Club of Nigeria International, Inc.  
16 Wright Street  
Edison, New Jersey 08820

Petitioners believe that they will be damaged by the above-identified registration, and hereby petition to cancel the same.

### **PARTIES**

1. Petitioner, Peoples Club of Nigeria International—Princeton Junction Branch, is a New Jersey Corporation located at Post Office Box 642, Princeton Junction, New Jersey 08550.
2. Petitioner, Peoples Club of Nigeria International—Miami Branch, is located at 2530 NW 131 Street, Miami, Florida 33167.
3. Petitioner, Peoples Club of Nigeria International—Chicago Branch, is located at 7717 Keeler Avenue, Skokie, Illinois 60076.
4. Petitioners are represented by Craig S. Hilliard, Esq., Stark & Stark, P.C., 993 Lenox Drive, Lawrenceville, New Jersey 08648.
5. Registrant, Peoples Club of Nigeria International, Inc. ("PCNI" or "Registrant"), is a New Jersey corporation located at 16 Wright Street, Edison, New Jersey 08820.
6. Registrant is represented by Matthew H. Swyers, Esq., The Trademark Company, 344 Maple Ave. West, Suite 151, Vienna, Virginia 22180.

### **FACTS**

7. Registrant filed a Certification of Incorporation with the State of New Jersey on August 18, 2010. See Ex. "A."

8. Petitioner, PCNI Princeton Junction Branch, filed a Certification of Incorporation with the State of New Jersey on December 4, 2006. See Ex. “B.”
9. On November 12, 2013, Registrant filed an application with the United States Patent and Trademark Office (“USPTO”) to register a service mark that consisted of the words “Peoples Club of Nigeria International” with three rings linked together in a blue circle bordered in black linked to a red circle bordered in black linked to a yellow circle bordered in black.
10. In the trademark application, the Registrant declared under oath that it “believe[d] the applicant to be the owner of the trademark/service mark sought to be registered....”
11. Additionally, in the trademark application, the Registrant declared under oath that “to the best of [its] knowledge and belief no other person, firm, corporation, or association has the right to use the mark in commerce....”
12. The Registrant attached a sample PCNI letterhead to the trademark application. On that document the words “Info@thetrademarkcompany.com” and “Attn: New Mark Design” were scrolled in handwritten writing. Notably, the Princeton Junction branch, Miami branch, Chicago branch and 17 other branches were listed as USA branches on the letterhead.
13. On February 27, 2014, the USPTO issued an Office Action in response to the Registrant’s application.
14. In that Office Action, the USPTO sought clarification of the entity information requirement. The USPTO stated, “In the application, applicant identified its legal entity as an ‘association’ organized in Nigeria. In addition to specifying the country

under whose laws it is organized or exists, applicant must also indicate whether the association is incorporated or unincorporated.”

15. On April 9, 2014, the Registrant filed a Response to the Office Action. In that Response, the Registrant attached another PCNI letterhead. The Registrant represented that the letterhead was a specimen of the Mark in use as of the date of the filing of the application. Prominently displayed along the top of that letterhead was a detailed listing of various “USA Branches.” Notably, the Princeton Junction branch was *not* present on this letterhead. Nor were the Miami and Chicago branches listed.
16. There is a current dispute within PCNI between the Petitioners and Registrant. The split has created two primary groups.
17. The first group is the Pentagons, also known as the Leadership Core Group. The Registrant is affiliated with this group.
18. The second group is the Progressives. The Progressives consist of the Petitioner branches.<sup>1</sup>
19. The Registrant and its affiliates (i.e. the Leadership Core Group or Pentagons) consider the Petitioners (i.e. the Progressives) illegitimate.
20. By a “Public Notice” dated July 17, 2014, the Registrant stated that it had retained trademark attorneys to enforce its registered trademark. See Ex. “C.”
21. Notably, in the Response to Office Action, the Registrant indicated that PCNI was a “corporation” incorporated in “Nigeria.”

---

<sup>1</sup> The following branches are also part of the Progressive group: PCNI Houston, PCNI Washington D.C., PCNI New York, PCNI Cherry Hill, PCNI San Francisco, PCNI San Antonio, and PCNI Toronto.

22. The Service Mark was registered on August 26, 2014, under Registration No. 4,591,874.

### **GROUND FOR CANCELLATION**

23. Petitioner repeats and realleges all of the foregoing allegations as if repeated verbatim herein.

24. Registrant committed fraud on the USPTO in stating under oath in its application that Registrant had an exclusive right to use the Mark. Registrant purposefully removed some of the Petitioners from the PCNI letterhead prior to submitting its Response to Office Action on April 9, 2014. Registrant now claims exclusive use of the registered Mark, fails to recognize Petitioners' lawful and long-standing right to use the Mark and threatens to initiate litigation to prevent Petitioners' use of the Mark.

25. Registrant committed fraud on the USPTO in stating under oath in its application that Registrant was a Nigerian corporation. In fact, Registrant is a New Jersey corporation. See Ex. "A."

26. Petitioners, along with all other USA branches of PCNI, have long used the Mark recently registered with the USPTO.

27. Registrant committed fraud by not disclosing to the USPTO that the two factions in each USA branch (the Progressives and the Pentagons) have used the Mark lawfully for many years. Petitioners have used the Mark since inception of their respective branches.

28. Registrant failed to inform the USPTO of its plan to use the Mark for the exclusive benefit of the Pentagon faction. The Registrant deliberately failed to inform the USPTO that the Petitioners had used the Mark in the past.

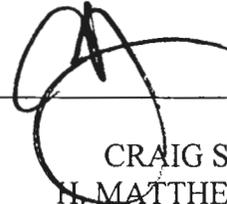
CONCLUSION

For the reasons expressed herein, Petitioners believe that the registration was fraudulently obtained and that the trademark application and subsequent submissions were less than complete. As such, Petitioners respectfully request that the registration be cancelled and for such other relief as appropriate.

Respectfully submitted,

Stark & Stark  
A Professional Corporation

By: \_\_\_\_\_



CRAIG S. HILLIARD  
H. MATTHEW TAYLOR  
993 Lenox Drive, Bldg. 2  
Lawrenceville, NJ 08648  
(609) 895-7346  
*Attorneys for Petitioner*

Date: \_\_\_\_\_

9/16/14

**E**

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**B**

**I**

**T**

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STATE OF NEW JERSEY  
DEPARTMENT OF THE TREASURY  
FILING CERTIFICATION (CERTIFIED COPY)

PEOPLE'S CLUB OF NIGERIA INTERNATIONAL, INC.  
0101010702

*I, the Treasurer of the State of New Jersey,  
do hereby certify, that the above named business  
did file and record in this department a  
Certificate of Incorporation on August 18th, 2010  
and that the attached is a true copy of this  
document as the same is taken from and compared  
with the original(s) filed in this office and now  
remaining on file and of record.*



Certificate Number: 117938876

Verify this certificate online at

[https://www1.state.nj.us/TYTR\\_StandingCert/JSP/Verify\\_Cert.jsp](https://www1.state.nj.us/TYTR_StandingCert/JSP/Verify_Cert.jsp)

*IN TESTIMONY WHEREOF, I have  
hereunto set my hand and affixed  
my Official Seal at Trenton, this  
19th day of August, 2010*

*Andrew P Sidamon-Eristoff  
State Treasurer*

**E**

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STATE OF NEW JERSEY  
DEPARTMENT OF TREASURY  
FILING CERTIFICATION (CERTIFIED COPY)

PEOPLE'S CLUB OF NIGERIA INTERNATIONAL  
PRINCETON JUNCTION, NJ BRANCH INC.

0100972745

*I, the Treasurer of the State of New Jersey,  
do hereby certify, that the above named business  
did file and record in this department a  
Certificate of Incorporation on December 4th, 2006  
and that the attached is a true copy of this  
document as the same is taken from and compared  
with the original(s) filed in this office and now  
remaining on file and of record.*

IN TESTIMONY WHEREOF, I have  
hereunto set my hand and  
affixed my Official Seal  
at Trenton, this  
19th day of December, 2006



*Bradley Abelow*

Bradley Abelow  
State Treasurer

**E**

**X**

**H**

**I**

**B**

**I**

**T**

**C**

July 17, 2014

To: ALL PCNI BRANCHES  
ALL MEMBERS OF PCNI  
MEMBERS OF GENERAL PUBLIC

Re: Un-authorized use of the name of Peoples Club of Nigeria International posted by Chief Sam C. Iwuchukwu and Hon Alhaji A. N. Obinwa dated 16<sup>th</sup> July, 2014.

Chief Iwuchukwu and Alhaji Obinwa in a signed statement posted the following on the internet:

“To be clear, Peoples Club of Nigeria International and Club Trademark Design registered in New Jersey USA under the President Emeritus and Patron Trustee Elect, Chief Fabian Onwuachu regime, belongs to all PCNI members... Thus, any legal action instituted by any person on the Trademark Design #86116372 shall be met by a counterclaim.”

Let the public be advised that the premise of the declaration authored by Chief Sam C. Iwuchukwu and Hon Alhaji Obinwa is patently false and therefore their declaration as published on July 16, 2014 is erroneous in its entirety. Chief Sam Iwuchukwu whom I know cannot knowingly and publicly invite the public to violate the United States Trademark laws.

I hereby declare the following to the public knowing fully well that if my declaration is false I am subject to punishment:

1. That I, Dr. Iddi Mgbako, am the incorporator and the Agent of the Peoples Club of Nigeria International (PCNI).
2. That PCNI is registered in the United States with a Federal Identification Number and a bank account in New Jersey.
3. That the US Address of PCNI is 16 Wright St. Edison, New Jersey.
4. That there is no Club Trademark Design registered in New Jersey USA under Chief Fabian Onwuachu.
5. That the name PCNI and its 3 ring design with serial #86116372 is an approved trademark by the United States Government.
6. That any and all infringers of this trademark who are nonmembers of PCNI are hereby made aware of the serious consequences of the violation of the PCNI trademark reserved for use by only legitimate members of PCNI.
7. That the legitimate members of PCNI in the USA are members of one of our 17 branches who are part of the leadership core group (LCG) under the Chairmanship of Hon Bernard Osuagwu who are current with their SSS annual dues payment for the year 2013.
8. That those members who have either been suspended, expelled, or constitutionally rendered inactive due to nonpayment of SSS dues are

unauthorized persons under the Trademark Laws and their gathering under the name and logo of PCNI is unauthorized and a violation of Federal Law.

9. That the public be advised that we have retained Trademark attorneys for enforcement of our trademark. Any individual who has a counterclaim should send the name of their attorney to our PCNI US Address for the purpose of our attorney communicating with their attorney and avoiding unnecessary litigation.
10. That the public be aware that the legitimate leaders of PCNI as elected in December 2013 are Chief Joe Ilonze, President and Hon Smart Ebere, Secretary.

Please direct all inquiries to:

PCNI Trademark Enforcement Group  
Peoples Club of Nigeria International  
16 Wright St.  
Edison, NJ 08820

Phone: 908-757-6456

Fax: 908-757-6476

Patron Dr. Eze Iddi Ambrose Mgbako, MD  
Trademark Agent, PCNI  
Papal Knight of St. Gregory the Great  
July 17, 2014

ESTTA Tracking number: **ESTTA630117**

Filing date: **09/30/2014**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92059944
Party	Defendant Peoples Club of Nigeria International
Correspondence Address	PEOPLES CLUB OF NIGERIA INTERNATIONAL 16 WRIGHT ST EDISON, NJ 08820 UNITED STATES
Submission	Answer
Filer's Name	Matthew H. Swyers
Filer's e-mail	mswyers@thetrademarkcompany.com
Signature	/Matthew H. Swyers/
Date	09/30/2014
Attachments	Answer.pdf(169865 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
The Trademark Trial and Appeal Board**

U.S. Registration No. 4,591,874,  
For the mark PEOPLES CLUB OF NIGERIA INTERNATIONAL,  
Registered on the Official Registry August 26, 2014.

Peoples Club of Nigeria International Princeton- Junction, NJ Branch, Inc.; Peoples Club of Nigeria- International-Miami Branch; and Peoples Club of- Nigeria International-Chicago Branch,	:	
	:	
Petitioners,	:	Cancellation No. 92059944
	:	
vs.	:	
	:	
Peoples Club of Nigeria International,	:	
	:	
Registrant.	:	

**ANSWER AND GROUNDS OF DEFENSE**

COMES NOW the Registrant, Peoples Club of Nigeria International (hereinafter “Registrant”), by and through counsel, The Trademark Company, PLLC, and files their Answer and Grounds of Defense to the Petition to Cancel and in response to Petitioner’s allegations states as follows:

**ANSWER**

Registrant is without knowledge of the allegations set forth in the Introductory Paragraph of the Petitioner’s Petition to Cancel and therefore denies the same. In response to the specifically enumerated allegations, the Registrant states as follows:

1. Registrant is without knowledge of the allegations set forth in paragraph 1 of the Petition to Cancel and therefore denies the same.
2. Registrant is without knowledge of the allegations set forth in paragraph 2 of the Petition to Cancel and therefore denies the same.
3. Registrant is without knowledge of the allegations set forth in paragraph 3 of the Petition to Cancel and therefore denies the same.
4. Registrant is without knowledge of the allegations set forth in paragraph 4 of the Petition to Cancel and therefore denies the same.

5. Registrant admits the allegations contained in Paragraph 5 of the Petition to Cancel.
6. Registrant admits the allegations contained in Paragraph 6 of the Petition to Cancel.
7. Registrant admits the allegations contained in Paragraph 7 of the Petition to Cancel.

Registrant cannot verify the authenticity of the attached Exhibit A and therefore denies the same.

8. Registrant is without knowledge of the allegations set forth in paragraph 8 of the Petition to Cancel and therefore denies the same. Registrant cannot verify the authenticity of the attached Exhibit B and therefore denies the same.

9. Registrant admits the allegations contained in Paragraph 9 of the Petition to Cancel.

10. Registrant admits the allegations contained in Paragraph 10 of the Petition to Cancel.

11. Registrant admits the allegations contained in Paragraph 11 of the Petition to Cancel.

12. Registrant admits the allegations contained in Paragraph 12 of the Petition to Cancel.

13. Registrant admits the allegations contained in Paragraph 13 of the Petition to Cancel.

14. Registrant admits the allegations contained in Paragraph 14 of the Petition to Cancel.

15. Registrant admits the allegations contained in Paragraph 15 of the Petition to Cancel.

16. Registrant denies the allegations set forth in Paragraph 16 of the Petition to Cancel as phrased and demands strict proof thereof.

17. Registrant denies the allegations set forth in Paragraph 17 of the Petition to Cancel as phrased and demands strict proof thereof.

18. Registrant is without knowledge of the allegations set forth in Paragraph 18 of the Petition to Cancel and therefore denies the same.

19. Registrant denies the allegations set forth in Paragraph 19 of the Petition to Cancel as phrased and demands strict proof thereof.

20. Registrant cannot verify the authenticity of the attached Exhibit C and therefore denies the same.

21. Registrant admits the allegations contained in Paragraph 21 of the Petition to Cancel.

22. Registrant admits the allegations contained in Paragraph 22 of the Petition to Cancel.

23. There are no allegations to respond to in Paragraph 23 of the Petition to Cancel. As such, Registrant incorporates by reference its responses to the allegations contained in Paragraphs 1-22 as stated hereinabove.

24. Registrant denies the allegations set forth in Paragraph 24 of the Petition to Cancel and demands strict proof thereof.

25. Registrant denies the allegations set forth in Paragraph 25 of the Petition to Cancel and demands strict proof thereof. Registrant cannot verify the authenticity of the attached Exhibit A and therefore denies the same.

26. Registrant denies the allegations set forth in Paragraph 26 of the Petition to Cancel and demands strict proof thereof.

27. Registrant denies the allegations set forth in Paragraph 27 of the Petition to Cancel and demands strict proof thereof.

28. Registrant denies the allegations set forth in Paragraph 28 of the Petition to Cancel and demands strict proof thereof.

WHEREFORE, Registrant prays that the Petition to Cancel be dismissed.

Respectfully submitted this 30<sup>th</sup> day of September, 2014.

THE TRADEMARK COMPANY, PLLC

/Matthew H. Swyers/  
Matthew H. Swyers, Esq.  
344 Maple Avenue West, Suite 151  
Vienna, VA 22180  
Tel. (800) 906-8626  
Facsimile (270) 477-4574  
mswyers@TheTrademarkCompany.com  
Counsel for Registrant

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
The Trademark Trial and Appeal Board**

U.S. Registration No. 4,591,874,  
For the mark PEOPLES CLUB OF NIGERIA INTERNATIONAL,  
Registered on the Official Registry August 26, 2014.

Peoples Club of Nigeria International Princeton- Junction, NJ Branch, Inc.; Peoples Club of Nigeria- International-Miami Branch; and Peoples Club of- Nigeria International-Chicago Branch,	:	
	:	
Petitioners,	:	Cancellation No. 92059944
	:	
vs.	:	
	:	
Peoples Club of Nigeria International,	:	
	:	
Registrant.	:	

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I caused a copy of the foregoing this 30<sup>th</sup> day of September, 2014, to  
be served, via first class mail, postage prepaid, upon:

CRAIG S HILLARD, ESQ.  
STARK & STARK PC  
993 LENOX DRIVE, BLDG 2  
LAWRENCEVILLE, NJ 08648

/Matthew H. Swyers/  
Matthew H. Swyers

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
The Trademark Trial and Appeal Board**

U.S. Registration No. 4,591,874,  
For the mark PEOPLES CLUB OF NIGERIA INTERNATIONAL,  
Registered on the Official Registry August 26, 2014.

Peoples Club of Nigeria International Princeton- Junction, NJ Branch, Inc.; Peoples Club of Nigeria- International-Miami Branch; and Peoples Club of- Nigeria International-Chicago Branch,	:	
	:	
Petitioners,	:	Cancellation No. 92059944
	:	
vs.	:	
	:	
Peoples Club of Nigeria International,	:	
	:	
Registrant.	:	

**INITIAL DISCLOSURES**

COMES NOW the Registrant, Peoples Club of Nigeria International (hereinafter “Registrant”), and pursuant to the scheduling order entered in this matter provides the following initial disclosures as required by the applicable rules of the Board.

**Disclosures**

1. The name(s) and address(es) of each individual likely to have discoverable information along with the subject(s) of that information that may be used to support Registrant’s claims:

Dr. Ambrose Mgbako  
16 Wright St.  
Edison, NJ 08820

\* Dr. Ambrose Mgbako retains information concerning all aspects of the instant matter including, but not limited to, Registrant’s rights in the mark at issue, dates of use thereof, marketing and other stream of commerce matters, as well as other information pertinent to the instant claims.

2. Copies or descriptions of all documents, electronically stored information, and tangible things that Registrant has in its possession, custody, or control and may use to support its claims or defenses:

Registrant retains business records, trademark applications and registrations and other pertinent documents which it may use to support its claims in the instant matter.

3. For inspection and copying any insurance agreement:

None.

DATED this 7<sup>TH</sup> day of January, 2015.

THE TRADEMARK COMPANY, PLLC

/Matthew H. Swyers/

Matthew H. Swyers, Esquire

344 Maple Avenue West, Suite 151

Vienna, VA 22180

Telephone (800) 906-8626 x 100

Facsimile (270) 477-4574

[mshyers@TheTrademarkCompany.com](mailto:mshyers@TheTrademarkCompany.com)

Attorney for Registrant





344 Maple Avenue West, PMB 151  
Vienna, VA 22180  
Tel. (800) 906-8626  
Fax (270) 477-4574  
TheTrademarkCompany.com

Matthew H. Swyers, Esq.\*  
Writer's Direct (800) 906-8626 x100  
mswyers@TheTrademarkCompany.com

**FRE 408 Applies**

March 2, 2015

VIA USPS & ELECTRONIC MAIL

H. Matthew Taylor, Esq.  
Stark & Stark P.C.  
993 Lenox Drive  
Lawrenceville, NJ 08648  
mtaylor@stark-stark.com

**RE: Peoples Club of Nigeria International - Princeton Junction v. Peoples Club of Nigeria International**

Dear Mr. Taylor,

As you know, we represent Peoples Club of Nigeria International in connection with the above-referenced matter. Thank you for your letter dated February 3, 2014 concerning the disclosure of the documents identified in the Registrant's Initial Disclosures. Enclosed please find documents in support thereof.

Thank you for your time and attention to this matter. Should you have any questions regarding this matter, please do not hesitate to contact us.

Yours very truly,

/Matthew H. Swyers/

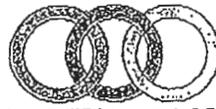
cc: MTaylor@stark-stark.com;  
chilliard@stark-stark.com; and  
lrickett@stark-stark.com

# PEOPLES CLUB OF NIGERIA/INTERNATIONAL

CAC/IT/No.1295

US SERIAL NO. 86116372

**BANKERS:**  
PNC Bank  
Zenith Bank of Nigeria Plc.



MOTTO: UNITY, LOVE & SERVICE

**NIGERIA/INTERNATIONAL HEADQUARTERS:**

Onitsha/Owerri Road,  
P.O. Box 5421  
Onitsha, Anambra State,  
Tel: 08037080187, 08066728872  
E-mail: peopleclubofnigeria@yahoo.com  
Website: www.peoplesclubofnigeria.com

Our Ref: \_\_\_\_\_ Your Ref: \_\_\_\_\_ Date: \_\_\_\_\_

**NATIONAL INTERNATIONAL OFFICERS**

- President  
Chief Sir J. I. Ilonze
- 1st Vice President  
Chief Onyiah O. Okeke
- 2nd Vice President  
Chief R. O. C. Ekeke
- 3rd Vice President  
Chief Sam Ikpeye
- National Secretary  
Eder Smart O. Ebere
- 1st Assistant National Sec.  
Chief C. C. Nwankwu
- 2nd Assistant National Sec.  
Lady Debi Anyafor
- Financial Secretary  
Chief P. N. Okeke
- Legal Adviser  
Chief F. O. Okeke
- Assistant Legal Adviser  
Barr. Okeke
- Publicity Secretary  
Cpl. J. O. W. Okeke
- Assistant Publicity Sec.  
Prof. Emma Okeke
- Protocol Officer  
Chief Alan Okeke
- Assistant Protocol Officer  
Hon. Dan Okeke
- Welfare Officer  
Chief Law Okeke
- Assistant Welfare Officer  
Chief Godwin Okeke
- 2nd Assistant Welfare Officer  
Lady Ruby Okeke
- 3rd Assistant Welfare Officer  
Adekunle Okeke
- House Master  
Chief Mark Okeke
- Assistant House Master  
Chief Ernest O. Okeke
- 2nd Assistant House Master  
Hon. Wike Okeke
- 3rd Assistant House Master  
Hon. Aruna Okeke

July 14 2014

*Dr. Ambrose Mgbako MD  
Patron – Peoples Club of Nigeria Int'l  
New Jersey  
USA*

**TRADEMARK PEOPLES CLUB OF NIGERIA  
INTERNATIONAL (DESIGN)  
US SERIAL #86116372**

*Dr. Ambrose Mgbako MD, patron Peoples Club of Nigeria is the Agent, appointed to monitor the Peoples Club of Nigeria International trademark in USA and assure that unauthorized users do not infringe on this trademark.*

*Dr. Mgbako is hereby granted full authority to prosecute any infringement of this trademark by unauthorized users.*

Signed:

**Chief Dr. Sir J. I. Ilonze  
National President**

**Hon. Smart Ebere  
General Secretary**

TRUSTEES: HRM Igwe P.O. Ezenwa, Chief J. O. Igwe, Chief E. N. Okeke, Chief I. Ojukwu Ike, HRM Igwe R.N. Nwanwa, Chief J.C. Okeke, Chief F. N. Okeke  
Address all correspondence to the General Secretary  
nwanwa@peopleclubofnigeria.com (08066728872)

1 OF 1 RECORD(S)

## New Jersey Secretary of State

### Corporate Filing

#### Business Information

Filing Number: 0101010702  
Name: PEOPLE'S CLUB OF NIGERIA INTERNATIONAL INC.  
Name Type: LEGAL  
Filing Date: 08/18/2010  
Status: ACTIVE  
Place Incorporated: NEW JERSEY

#### Registered Agent

Name: IDDI, AMBROSE MGBAKO  
Registered Agent Address: 16 WRIGHT ST  
EDISON, NJ 08820-1018

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Your DPPA Permissible Use is: Litigation  
Your GLBA Permissible Use is: Legal Compliance

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PTO Form 1478 (Rev 9/2006)  
 OMB No. 0651-0009 (Exp 12/31/2014)

Trademark/Service Mark Application, Principal Register  
**TEAS Plus Application**

*NOTE: Data fields with the \* are mandatory. The wording "(if applicable)" appears where the field is only mandatory under the facts of the particular application.*

The table below presents the data as entered.

Input Field	Entered
TEAS Plus	YES
<b>MARK INFORMATION</b>	
*MARK	<u>mark_9767147154-131702076 . logo.jpg</u>
*SPECIAL FORM	YES
USPTO-GENERATED IMAGE	NO
LITERAL ELEMENT	PEOPLES CLUB OF NIGERIA INTERNATIONAL
*COLOR MARK	YES
*COLOR(S) CLAIMED (If applicable)	The color(s) black, blue, red, yellow is/are claimed as a feature of the mark.
*DESCRIPTION OF THE MARK (and Color Location, if applicable)	The mark consists of the black letters PEOPLES CLUB OF NIGERIA INTERNATIONAL above a blue circle bordered in black linked to a red circle bordered in black linked to a yellow circle bordered in black.
PIXEL COUNT ACCEPTABLE	YES
PIXEL COUNT	944 x 295
<b>APPLICANT INFORMATION</b>	
*OWNER OF MARK	Peoples Club of Nigeria International
*STREET	16 Wright St.
*CITY	Edison
*STATE (Required for U.S. applicants)	New Jersey
*COUNTRY	United States
*ZIP/POSTAL CODE (Required for U.S. applicants only)	08820
<b>LEGAL ENTITY INFORMATION</b>	
*TYPE	association

Input Field	Entered
* STATE/COUNTRY WHERE LEGALLY ORGANIZED	Nigeria
<b>GOODS AND/OR SERVICES AND BASIS INFORMATION</b>	
*INTERNATIONAL CLASS	041
*IDENTIFICATION	Social club services, namely, arranging, organizing, and hosting social events, get-togethers, and parties for club members
*FILING BASIS	SECTION 1(a)
FIRST USE ANYWHERE DATE	At least as early as 00/00/1994
FIRST USE IN COMMERCE DATE	At least as early as 00/00/1994
SPECIMEN FILE NAME(S)	<u>SPE0-9767147154-131702076 . filename-1.pdf</u>
SPECIMEN DESCRIPTION	letterhead
<b>ADDITIONAL STATEMENTS SECTION</b>	
*TRANSLATION (if applicable)	
*TRANSLITERATION (if applicable)	
*CLAIMED PRIOR REGISTRATION (if applicable)	
*CONSENT (NAME/ LIKENESS) (if applicable)	
*CONCURRENT USE CLAIM (if applicable)	
DISCLAIMER	No claim is made to the exclusive right to use "Nigeria" apart from the mark as shown.
<b>ATTORNEY INFORMATION</b>	
NAME	Matthew H. Swyers, Esq.
FIRM NAME	The Trademark Company
STREET	344 Maple Ave. West, Suite 151
CITY	Vienna
STATE	Virginia
COUNTRY	United States
ZIP/POSTAL CODE	22180
PHONE	1-800-906-8626

Input Field	Entered
FAX	1-877-351-5480
EMAIL ADDRESS	info@thetrademarkcompany.com
AUTHORIZED TO COMMUNICATE VIA EMAIL	Yes
<b>CORRESPONDENCE INFORMATION</b>	
*NAME	Matthew H. Swyers, Esq.
FIRM NAME	The Trademark Company
*STREET	344 Maple Ave. West, Suite 151
*CITY	Vienna
*STATE (Required for U.S. applicants)	Virginia
*COUNTRY	United States
*ZIP/POSTAL CODE	22180
PHONE	1-800-906-8626
FAX	1-877-351-5480
*EMAIL ADDRESS	info@thetrademarkcompany.com
*AUTHORIZED TO COMMUNICATE VIA EMAIL	Yes
<b>FEE INFORMATION</b>	
NUMBER OF CLASSES	1
FEE PER CLASS	275
*TOTAL FEE PAID	275
<b>SIGNATURE INFORMATION</b>	
* SIGNATURE	/Matthew H. Swyers/
* SIGNATORY'S NAME	Matthew H. Swyers
* SIGNATORY'S POSITION	Attorney of Record
SIGNATORY'S PHONE NUMBER	1-800-906-8626
* DATE SIGNED	11/12/2013

[Back](#) | [View/Save Data as PDF](#)

# United States of America

United States Patent and Trademark Office

## PEOPLES CLUB OF NIGERIA INTERNATIONAL



Reg. No. 4,591,874

Registered Aug. 26, 2014

Int. Cl.: 41

SERVICE MARK

PRINCIPAL REGISTER

PEOPLES CLUB OF NIGERIA INTERNATIONAL (NIGERIA CORPORATION)  
16 WRIGHT ST.  
EDISON, NJ 08820

FOR: SOCIAL CLUB SERVICES, NAMELY, ARRANGING, ORGANIZING, AND HOSTING SOCIAL EVENTS, GET-TOGETHERS, AND PARTIES FOR CLUB MEMBERS, IN CLASS 41 (U.S. CLS. 100, 101 AND 107).

FIRST USE 0-0-1994; IN COMMERCE 0-0-1994.

NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "CLUB OF NIGERIA INTERNATIONAL", APART FROM THE MARK AS SHOWN.

THE COLOR(S) BLACK, BLUE, RED, AND YELLOW IS/ARE CLAIMED AS A FEATURE OF THE MARK.

THE MARK CONSISTS OF THE BLACK LETTERS "PEOPLES CLUB OF NIGERIA INTERNATIONAL" ABOVE A BLUE CIRCLE BORDERED IN BLACK LINKED TO A RED CIRCLE BORDERED IN BLACK LINKED TO A YELLOW CIRCLE BORDERED IN BLACK.

SER. NO. 86-116,372, FILED 11-12-2013.

MEREDITH MARESCA, EXAMINING ATTORNEY



*Michelle K. Lee*

Deputy Director of the United States  
Patent and Trademark Office

**REQUIREMENTS TO MAINTAIN YOUR FEDERAL  
TRADEMARK REGISTRATION**

**WARNING: YOUR REGISTRATION WILL BE CANCELLED IF YOU DO NOT FILE THE  
DOCUMENTS BELOW DURING THE SPECIFIED TIME PERIODS.**

**Requirements in the First Ten Years\*  
What and When to File:**

*First Filing Deadline:* You must file a Declaration of Use (or Excusable Nonuse) between the 5th and 6th years after the registration date. See 15 U.S.C. §§1058, 1141k. If the declaration is accepted, the registration will continue in force for the remainder of the ten-year period, calculated from the registration date, unless cancelled by an order of the Commissioner for Trademarks or a federal court.

*Second Filing Deadline:* You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between the 9th and 10th years after the registration date.\* See 15 U.S.C. §1059.

**Requirements in Successive Ten-Year Periods\*  
What and When to File:**

You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between every 9th and 10th-year period, calculated from the registration date.\*

**Grace Period Filings\***

The above documents will be accepted as timely if filed within six months after the deadlines listed above with the payment of an additional fee.

**The United States Patent and Trademark Office (USPTO) will NOT send you any future notice or  
reminder of these filing requirements.**

**\*ATTENTION MADRID PROTOCOL REGISTRANTS:** The holder of an international registration with an extension of protection to the United States under the Madrid Protocol must timely file the Declarations of Use (or Excusable Nonuse) referenced above directly with the USPTO. The time periods for filing are based on the U.S. registration date (not the international registration date). The deadlines and grace periods for the Declarations of Use (or Excusable Nonuse) are identical to those for nationally issued registrations. See 15 U.S.C. §§1058, 1141k. However, owners of international registrations do not file renewal applications at the USPTO. Instead, the holder must file a renewal of the underlying international registration at the International Bureau of the World Intellectual Property Organization, under Article 7 of the Madrid Protocol, before the expiration of each ten-year term of protection, calculated from the date of the international registration. See 15 U.S.C. §1141j. For more information and renewal forms for the international registration, see <http://www.wipo.int/madrid/en/>.

**NOTE:** Fees and requirements for maintaining registrations are subject to change. Please check the USPTO website for further information. With the exception of renewal applications for registered extensions of protection, you can file the registration maintenance documents referenced above online at <http://www.uspto.gov>.

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
The Trademark Trial and Appeal Board**

U.S. Registration No. 4,591,874,  
For the mark PEOPLES CLUB OF NIGERIA INTERNATIONAL,  
Registered on the Official Registry August 26, 2014.

Peoples Club of Nigeria International Princeton- Junction, NJ Branch, Inc.; Peoples Club of Nigeria- International-Miami Branch; and Peoples Club of- Nigeria International-Chicago Branch,	:	
	:	
Petitioners,	:	Cancellation No. 92059944
	:	
vs.	:	
	:	
Peoples Club of Nigeria International,	:	
	:	
Registrant.	:	

**REGISTRANT'S ANSWERS AND OBJECTIONS TO PETITIONER'S  
FIRST SET OF INTERROGATORIES**

COMES NOW the Registrant, Peoples Club of Nigeria International (hereinafter "Registrant"), by and through counsel, The Trademark Company, PLLC, and submits the following answers and objections to Petitioners, Peoples Club of Nigeria International Princeton Junction, NJ Branch, Inc., Peoples Club of Nigeria International Miami Branch and Peoples Club of Nigeria International-Chicago Branch (hereinafter "Petitioners") first set of interrogatories stating as follows:

**INTERROGATORIES**

**REQUEST NO. 1:** Please state the full name, date of birth, social security number, present business address, and present residential address for any individual(s) answering these Interrogatories.

**ANSWER:** Ambrose Mgbako, MD with assistance of counsel.

**Name:** Ambrose Mgbako, MD;

**Date of Birth:** June 17, 1944; **SSN:** \*\*-\*\*-7387;

**Current Business Address:** 100 Valley Rd. Suite 1, Montclair, NJ 07042; and

**Current Residential Address:** 16 Wright St., Edison, NJ 08820

**REQUEST NO. 2:** Please identify all persons that provided assistance or information in answering these Interrogatories and specify the Interrogatories on which they provided assistance or information.

**ANSWER:** Ambrose Mgbako, MD with assistance of undersigned counsel.

**REQUEST NO. 3:** Please attach any and all documents referenced in your answers to Interrogatories.

**ANSWER:** All responsive documents referenced in Registrant's Responses to Petitioner's Interrogatories have been provided by Registrant in Registrant's Responses to Petitioner's Requests for Production of Documents.

**REQUEST NO. 4:** Identify all persons you believe have personal knowledge of any facts relevant to this case. Briefly describe and summarize those facts for each person.

**ANSWER:** The individuals listed below are officers of the Peoples Club of Nigeria International and are familiar with the Club's structure, operations, the dissolution of Petitioner's branches, and other issues related to the use and registration of Registrant's Mark.

- Chief Sir Joseph Ilonze  
People's Club of Nigeria's National President
- Hon Dr. Onyekachi Okoro  
People's Club of Nigeria's Vice President
- Hon. Smart Ebere  
People's Club of Nigeria's General Secretary
- His Royal Majesty Dr. Igwe Arinze  
People's Club of Nigeria's Patron
- Innocent Aluka  
People's Club of Nigeria's Hon. Patron Professor
- Hon. Professor Emma Opara

People's Club of Nigeria's Assistant National Publicity Officer

- Hon. Attorney Bernard Nwaiwu Esq  
People's Club of Nigeria's Chairman  
People's Club of Nigeria's Past-Chairman, Leadership Core Group
- Hon. Bernard Osuagwu  
People's Club of Nigeria's Chairman Boston Branch  
People's Club of Nigeria's Current Chairman, Leadership Core Group
- Attorney Okey Akpom  
People's Club of Nigeria's National Deputy Legal Officer

**REQUEST NO. 5:** Set forth completely and in detail the factual basis for your claim that you are not responsible to the parties serving these Interrogatories as claimed in your Answer to the Petition to Cancel filed in this matter. Attach any and all relevant documents.

**ANSWER:** Registrant objects on the ground the Request is vague and ambiguous with respect to the term "responsible". Subject to the foregoing objection, see Registrant's Responses to Petitioner's Requests for Production of Documents.

**REQUEST NO. 6:** Set forth completely and in detail the factual basis for your claims that you have the exclusive ability to register a service mark that consists of the words "People's Club of Nigeria International" with three rings linked together in a blue circle bordered in black linked to a red circle bordered in black linked to a yellow circle bordered in black.

**ANSWER:** Registrant objects on the basis that this interrogatory asks for a legal opinion. Subject to the foregoing objection, see Registrant's Responses to Petitioner's Requests for Production of Documents.

**REQUEST NO. 7:** Have you obtained any statements relating to this action from any party (or the agent, servant or employee of any party)?

**ANSWER:** Registrant objects on the ground the Request is vague and ambiguous with respect to the term “statements”. Subject to the foregoing objection, see Registrant’s Responses to Petitioner’s Requests for Production of Documents.

If affirmative, separately, for each such statement, state the name and address of the person who gave the statement and the date upon which the statement was obtained; if oral, the name and address of the person who obtained the statement, and if recorded, the nature and present location of the recording.

**ANSWER:** Registrant objects on the ground the Request is vague and ambiguous with respect to the term “statements”. Subject to the foregoing objections, see Registrant’s Responses to Petitioner’s Requests for Production of Documents.

**REQUEST NO. 8:** Have any admissions or statements in the nature of an admission been made by any party to this action (or by the agent, servant or employee of any party)?

**ANSWER:** Registrant objects on the ground the Request is vague and ambiguous with respect to the terms “statements in the nature of admissions”. Subject to the foregoing objection, see Registrant’s Responses to Petitioner’s Requests for Production of Documents.

If so, separately, for each such admission or statement, state the identity of each person who made each such admission or statement; the identity of each person to whom each such admission or statement was made; the date, time, and place when and where each such admission or statement was made; and the precise words used by the person making each such admission or statement.

**ANSWER:** Registrant objects on the ground the Request is vague and ambiguous with respect to the terms “statements in the nature of admissions”. Subject to the foregoing objection, see Registrant’s Responses to Petitioner’s Requests for Production of Documents.

**REQUEST NO. 9:** Set forth, in detail, each and every lawsuit of any kind, including any actions before the Trademark Trial and Appeal Board, that Registrant has been involved with as a party within the last ten years.

**ANSWER:** Registrant objects to this request on the ground that the information is not relevant to this action and is not reasonably calculated to lead to the discovery of admissible evidence.

**REQUEST NO. 10:** Set forth, in detail, any and all instances in which you have requested Petitioners or any third party to discontinue the use of any portion of the registered mark that consists of the words "People's Club of Nigeria International" with three rings linked together in a blue circle bordered in black linked to a red circle bordered in black linked to a yellow circle bordered in black.

**ANSWER:** Registrant objects to this request on the ground that the information is not relevant to this action and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing objection, see Registrant's Responses to Petitioner's Requests for Production of Documents.

**REQUEST NO. 11:** Identify all communications, of any nature, you have had with any individual, agent or officer of a Petitioner organization regarding the allegations made in the Petition to Cancel. If such communication was verbal, identify the parties to the communication and describe, in detail, the substance of the communication. If such communication was in writing, attach copies hereto.

**ANSWER:** Registrant objects to the instant interrogatory request to the extent that it seeks information protected from disclosure by any privilege or immunity including, without limitation, the attorney-client privilege. Registrant further objects to the Instant Interrogatory on the grounds that it is overly broad and burdensome given the inclusion of the term "All". Subject to the foregoing objections, see Registrant's Responses to Petitioner's Requests for Production of Documents.

**REQUEST NO. 12:** Identify all communications, of any nature, you have had with a non-party regarding the allegations made in the Petition to Cancel. If such communication was verbal, identify the

parties to the communication and describe, in detail, the substance of the communication. If such communication was in writing, attach copies hereto.

**ANSWER:** Registrant objects to the instant interrogatory request to the extent that it seeks information protected from disclosure by any privilege or immunity including, without limitation, the attorney-client privilege. Registrant further objects to this request on the ground that the information is not relevant to this action and is not reasonably calculated to lead to the discovery of admissible evidence.

**REQUEST NO. 13:** Set forth, in detail, any and all facts that support the statements made in your trademark application that "no other person, firm, corporation, or association has the right to use the mark in commerce."

**ANSWER:** Registrant objects on the basis that this interrogatory asks for a legal opinion. Subject to the foregoing objection, see Registrant's Responses to Petitioner's Requests for Production of Documents.

**REQUEST NO. 14:** Set forth, in detail, your complete understanding of the general corporate structure of People's Club of Nigeria International within the United States and abroad.

**ANSWER:** People's Club of Nigeria International is a registered Nigerian Corporation with branches in Nigeria, United Kingdom, Canada, and United States of America. Each branch is organized under a Charter granted by People's Club of Nigeria International authorities in Nigeria. Each branch is a subsidiary of People's Club of Nigeria International registered in Nigeria and abides by the Club's Constitution. See also Registrant's Responses to Petitioner's Requests for Production of Documents.

**REQUEST NO. 15:** Set forth, in detail, the corporate structure of your branch of the People's Club of Nigeria. Please identify individuals by name and title within your organization.

**ANSWER:** The People's Club of Nigeria in New Jersey is a subsidiary of People's Club of Nigeria International. See also Registrant's Responses to Petitioner's Requests for Production of Documents

**REQUEST NO. 16:** Set forth, in detail, all facts that support your contention that you are a Nigerian corporation.

**ANSWER:** See Registrant's Responses to Interrogatory Requests 14 and 15 hereinabove. See also Registrant's Responses to Petitioner's Requests for Production of Documents.

**REQUEST NO. 17:** Set forth, in detail, all efforts that you took to protect your asserted interest in the mark that consists of the words "People's Club of Nigeria International" with three rings linked together in a blue circle bordered in black linked to a red circle bordered in black linked to a yellow circle bordered in black, *prior to* the time you filed for registration with the USPTO and registration issued.

**ANSWER:** Registrant objects to the Instant Interrogatory on the grounds that it is overly broad and burdensome given the inclusion of the term "All". Subject to the foregoing objection, see Registrant's Responses to Petitioner's Requests for Production of Documents.

**REQUEST NO. 18:** Set forth, in detail, all efforts that you took to protect your asserted interest in the mark that consists of the words "People's Club of Nigeria International" with three rings linked together in a blue circle bordered in black linked to a red circle bordered in black linked to a yellow circle bordered in black, *after* you filed for registration with the USPTO and registration issued.

**ANSWER:** Registrant objects to the Instant Interrogatory on the grounds that it is overly broad and burdensome given the inclusion of the term "All". Subject to the foregoing objection, see Registrant's Responses to Petitioner's Requests for Production of Documents.

DATED this 10<sup>th</sup> day of March, 2015.

THE TRADEMARK COMPANY, PLLC

/Matthew H. Swyers/

Matthew H. Swyers, Esquire

344 Maple Avenue West, Suite 151

Vienna, VA 22180

Telephone (800) 906-8626 x 100

Facsimile (270) 477-4574

[mswyers@TheTrademarkCompany.com](mailto:mswyers@TheTrademarkCompany.com)

Attorney for Registrant

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
The Trademark Trial and Appeal Board**

U.S. Registration No. 4,591,874,  
For the mark PEOPLES CLUB OF NIGERIA INTERNATIONAL,  
Registered on the Official Registry August 26, 2014.

Peoples Club of Nigeria International Princeton- Junction, NJ Branch, Inc.; Peoples Club of Nigeria- International-Miami Branch; and Peoples Club of- Nigeria International-Chicago Branch,	:	
	:	
Petitioners,	:	Cancellation No. 92059944
	:	
vs.	:	
	:	
Peoples Club of Nigeria International,	:	
	:	
Registrant.	:	

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I caused a copy of the foregoing this 10<sup>th</sup> day of March, 2015 to be served, via first class mail, postage prepaid, upon:

CRAIG S HILLARD, ESQ.  
STARK & STARK PC  
993 LENOX DRIVE, BLDG 2  
LAWRENCEVILLE, NJ 08648

/Matthew H. Swyers/  
Matthew H. Swyers

AMBROSE MGBAKO

COUNTY OF Middlesex

STATE OF NEW JERSEY

BEFORE ME, the undersigned authority, this 9 day of March 2015, personally appeared Mr. Ambrose Mgbako, who after being first duly sworn, states that he is the person who assisted and provided the answers to Petitioner's First Set of Interrogatories to Registrant and that the answers provided therein are true and correct, and who is personally known to me or who has produced NEW JERSEY Driver License as identification and who did take an oath.

Ambrose Mgbako  
Ambrose Mgbako

March 9 2015

Date

ZULEIKA Z HARRIS  
Notary Public  
State of New Jersey  
My Commission Expires June 2018  
I.D.# 2215069

Notary Public: Zuleika Z. Harris (signature)

Notary Public: Zuleika Z. Harris (Typed/Printed name of Notary Public)

Commission No. 2215069

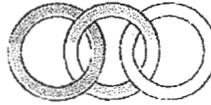
My Commission Expires: June 26, 2018

# PEOPLES CLUB OF NIGERIA/INTERNATIONAL

CAC/IT/No.1295

US SERIAL NO. 86116372

**BANKERS:**  
PNC Bank  
Zenith Bank of Nigeria Plc.



MOTTO: UNITY, LOVE & SERVICE

**INTERNATIONAL HEADQUARTERS:**  
Onitsha/Overri Road,  
P.O. Box 5421  
Onitsha, Anambra State,  
Tel: 08037080187, 08066728872  
E-mail: peopleclubofnigeria@yahoo.com  
Website: www.peoplesclubofnigeria.com

Our Ref: ..... Your Ref: ..... Date: .....

**NATIONAL INTERNATIONAL OFFICERS**

- President  
Chief Sir J. I. Ilonze
- 1st Vice President  
Chief Oyejide O. Okoro
- 2nd Vice President  
Chief R. O. O. Ekeborke
- 3rd Vice President  
Chief Sam Nwagwu
- National Secretary  
Eke Smart O. Ebere
- 1st Assistant National Sec.  
Chief C. C. Mgbako
- 2nd Assistant National Sec.  
Chief Dada Anyator
- Financial Secretary  
Chief Paulinus Oyejide
- Legal Adviser  
Chief F. O. Oyejokunle
- Assistant Legal Adviser  
Bisi Olay Ajayi
- Publicity Secretary  
Capt. J. O. W. Oyeana
- Assistant Publicity Sec.  
Prof. Emma Opara
- Protocol Office  
Chief Ayan Okoye
- Assistant Protocol Officer  
Hon. Don Ibekwe
- Welfare Officer  
Chief Law Major
- Assistant Welfare Officer  
Chief Godwin Okeke
- 2nd Assistant Welfare Officer  
Lafy Robby Nwodi
- 3rd Assistant Welfare Officer  
Chief Ben Okwagwu
- House Master  
Chief Martin Ezeke
- Assistant House Master  
Chief Ernest O. Ugoji
- 2nd Assistant House Master  
Hon. Victor Puzia
- 3rd Assistant House Master  
Hon. Anas Okeke

July 14 2014

*Dr. Ambrose Mgbako MD  
Patron – Peoples Club of Nigeria Int'l  
New Jersey  
USA*

**TRADEMARK PEOPLES CLUB OF NIGERIA  
INTERNATIONAL (DESIGN)  
US SERIAL #86116372**

*Dr. Ambrose Mgbako MD, patron Peoples Club of Nigeria is the Agent appointed to monitor the Peoples Club of Nigeria International trademark in USA and assure that unauthorized users do not infringe on this trademark.*

*Dr. Mgbako is hereby granted full authority to prosecute any infringement of this trademark by unauthorized users.*

Signed:

**Chief Dr Sir J. I. Ilonze  
National President**

**Hon. Smart Ebere  
General Secretary**

TRUSTEES: HRM Igwe P.C. Ezenwa, Chief J. O. Igwe, Chief E. N. Odinye, Chief I. Ojukwu Iko,  
HRM Igwe R.N. Nwankwo, Chief J.C. Okafor, Chief F. N. Okekeanu  
Address all correspondence to the General Secretary  
honsmartebere@gmail.com (08066728872)

000001

consequences.

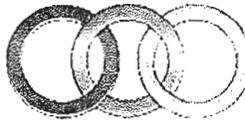
Chief (Sir) J.I. Ilonze  
President P.C.N.I.

Hon. (Elder) Smart O. Ebere  
General Secretary P.C.N.I

2 of 2

# PEOPLES CLUB OF NIGERIA/INTERNATIONAL

**BANKERS:**  
PNC Bank  
Zenith Bank of Nigeria Plc.



MOTTO: UNITY, LOVE & SERVICE

**NIGERIA/INTERNATIONAL HEADQUARTERS:**

Onitsha/Owerri Road,  
P.O. Box 5421  
Onitsha, Anambra State,  
Tel: 08037080187, 08066728872  
E-mail: peopleclubofnigeria@yahoo.com  
Website: www.peoplesclubofnigeria.com

Our Ref: ..... Your Ref: ..... Date: .....

17<sup>th</sup> January, 2014

- NATIONAL INTERNATIONAL OFFICERS**
- President  
Chief Sir J. I. Ilonze
  - 1st Vice President  
Chief Ojwach O. Osofi
  - 2nd Vice President  
Chief R. O. C. Ekeobi
  - 3rd Vice President  
Chief Sam Inagwa
  - National Secretary  
Elder Smart O. Ebere
  - 1st Assistant National Sec  
Chief C. C. Mgboma
  - 2nd Assistant National Sec.  
Chief Doris An. 1998
  - Financial Secretary  
Chief Paulinus Ojorhosa
  - Legal Adviser  
Chief F. O. Oyejide
  - Assistant Legal Adviser  
Elder Okey Akpan
  - Publicity Secretary  
Chief J. O. W. Oyejima
  - Assistant Publicity Sec  
Chief Emma Osofi

To: All Members of P.C.N.I  
All Branch of P.C.N.I. World  
Chicago Branch of P.C.N.I  
Miami Branch of P.C.N.I  
Princeton Junction Branch of P.C.N.I  
San-Antonio Branch of P.C.N.I

Final Dissolution and withdrawal of charter of Chicago, Miami and Princeton Junction Branches of P.C.N.I

Further to the decision of Central Executive Committee (C.E.C.) on 20<sup>th</sup> July, 2013 at Dallas Forth-Worth and letters of 7<sup>th</sup> September, 2013; dissolving the executive committee of Chicago, Miami and Princeton Junction branches pending the review of their status and re-constitution of new executives, the Club at its Annual General Meeting (AGM) held at its International Headquarters, Onitsha on 20<sup>th</sup> December, 2013, unanimously resolved as follows:

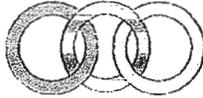
- (i) To close down Chicago, Miami and Princeton Junction completely and withdraw and or cancel the Club's charter for

*Dissolved*

# PEOPLES CLUB OF NIGERIA/INTERNATIONAL

CACTI No. 1295  
Registered in Nigeria.

**BANKERS:**  
PNC Bank  
Zenith Bank of Nigeria Plc.



Motto: UNITY, LOVE & SERVICE

US Serial No. 8616372  
Registered in United States.  
NIGERIA/INTERNATIONAL HEADQUARTERS:  
Onitsha / Owerri Road,  
P.O. Box 5421  
Onitsha, Anambra State,  
Tel: 08037080187, 08066728872.  
E-mail: peoplesclubofnigeria@yahoo.com  
Website: www.peoplesclubofnigeria.com

Our Ref:

Your Ref:

Date: 25/10/2014

MEMBER LIST

President  
CHIEF SIR J. I. ILOENZE

1st Vice President  
CHIEF ONYEKACHI O. OKORO

2nd Vice President  
CHIEF R. O. C. EKEODOZIE

3rd Vice President  
CHIEF SASHI INYIGWIE

National Secretary  
ELDER SMART O. EBERE

1st Assistant National Sec.  
CHIEF C. C. NJOEKWU

2nd Assistant National Sec.  
LADY DORIS ANYADOR

Financial Secretary  
CHIEF PAULINUS ONYENUFORO

National Treasurer  
CHIEF SIR DR. A. E. OKEKE

Legal Adviser  
CHIEF F. O. ONYEBUEKE

Assistant Legal Adviser  
ANTHONY OFUJ EGBUSI (KSM)

2nd Assistant Legal Adviser  
BAR. OKAY AKPOBI

Publicity Secretary  
CAPT. J. O. W. ONYEMA

Assistant Publicity Sec.  
PROF. ELLMA OFARA

Protocol Officer  
CHIEF ALVAN OKOYE

Assistant Protocol Officer  
HON. BON BERWE

Welfare Officer  
CHIEF GODDY ORANEDO

Assistant Welfare Officer  
LADY RUBY NKADI

2nd Assistant Welfare Officer  
IJE BON IKWUAGHUI

3rd Assistant Welfare Officer  
BRO. GODWIN ADJEJE

4th Assistant Welfare  
CHIEF S. O. IGBOAJAEZE

House Master  
CHIEF MARTIN EZEIKE

Assistant House Master  
CHIEF ERNEST O. UGORJI

2nd Assistant House Master  
HON. VICTOR IHEZIE

3rd Assistant House Master  
HON. AMARE OKEKE

To:

Patron Iddi Mgbako  
No. 16 Wright  
St Edison  
NJ 08820

Sir

## INFORMATION ABOUT PEOPLES CLUB OF NIGERIA

Peoples Club of Nigeria International is a social Club registered in Nigeria with branches in Nigeria, Canada, United Kingdom, and United States of America. Each branch is organized under a Charter granted by PCNI authorities in Nigeria. When a charter is withdrawn such a branch ceases to exist regardless of their registration status where they operate. The Club has the right to dissolve offending executives and appoint caretaker committees when appropriate.

The Peoples Club of Nigeria International New Jersey is a subsidiary of Peoples Club of Nigeria International registered in Nigeria. The Peoples Club of Nigeria International New Jersey operates under the constitution of Peoples Club of Nigeria registered in Nigeria. The branches of Peoples Club in the USA report directly to the authorities in Nigeria.

Patron Dr. Ambrose Mgbako is the current appointed agent of PCNI New Jersey and authorized to apply, obtain, monitor and prosecute any violation of Peoples Club of Nigeria International Trademark.

  
Chief (Dr) Sir J.I. Ilonze  
President PCNI

  
Hon. Elder Smart O. Ebere  
National Secretary PCNI

TRUSTEES: HRM Igwe P. C. Ezenwa, Chief J. O. Igwe, Chief E. N. Odilinye, Chief I. Ojukwu Ike,  
HRM Igwe R. N. Nwankwo, Chief J. C. Okafor, Chief F. R. Okekeazu  
Address all correspondence to the General Secretary  
honsmartebere@gmail.com (08066728872)

INTERROGATORY NO. 6

# PEOPLES CLUB OF NIGERIA/INTERNATIONAL

CAC/IT/No.1295

US SERIAL #86116372

**BANKERS:**  
PNC Bank  
Zenith Bank of Nigeria Plc.



MOTTO: UNITY, LOVE & SERVICE

**NIGERIA/INTERNATIONAL HEADQUARTERS:**

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Tel: 08037080187, 08066728872  
E-mail: peopleclubofnigeria@yahoo.com  
Website: www.peoplesclubofnigeria.com

Our Ref: \_\_\_\_\_ Your Ref: \_\_\_\_\_ Date: 16<sup>th</sup> July 2014

**NATIONAL INTERNATIONAL OFFICERS**

- President  
Chief Sir J. I. Ilonze
- 1st Vice President  
Chief Orykuadi O. Oloro
- 2nd Vice President  
Chief R. O. C. Ebiadu
- 3rd Vice President  
Chief Sam Nwagwu
- National Secretary  
Elder Smart O. Ebere
- 1st Assistant National Sec.  
Chief C. C. Mgbani
- 2nd Assistant National Sec.  
Lady Doris Anyador
- Financial Secretary  
Chief Paulinus Oyenuboro
- Legal Adviser  
Chief F. O. Oryebusa
- Assistant Legal Adviser  
Bart Okoye Alagon
- Publicity Secretary  
Capt. J. O. W. Oryema
- Assistant Publicity Sec.  
Prof. Enma Opara
- Protocol Office  
Chief Ahan Okoye
- Assistant Protocol Officer  
Hon Don Ebiwe
- Welfare Officer  
Chief Law Major
- Assistant Welfare Officer  
Chief Goddy Oranbo
- 2nd Assistant Welfare Officer  
Lady Ruby Ifeadi
- 3rd Assistant Welfare Officer  
Nke Bon Ikurugwu
- House Master  
Chief Martin Ezeke
- Assistant House Master  
Chief Ernest O. Ugorji
- 2nd Assistant House Master  
Hon. Victor Ihezue
- 3rd Assistant House Master  
Hon. Anani Okete

**TO:**

- 1) All members of Peoples Club of Nig. Int'l (PCNI)
- 2) The General Public

**REF: UNAUTHORIZED USE OF THE NAME & LOGO OF PEOPLES CLUB OF NIGERIA INTERNATIONAL (PCNI).**

Further to our earlier warning letter of 14<sup>th</sup> July 2014, we hereby restate that **The Peoples Club of Nigeria International (PCNI)**, and its three-ring Motto: **Unity, Love & Service** is a "Trade Mark" entity with a serial #86116372.

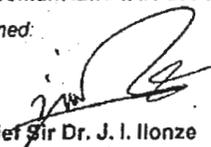
The attention of the Headquarters of Peoples Club of Nigeria International has been drawn to a proposed illegal assembly or gathering of certain expelled members and non-members of the Club in New York, San Francisco, San Antonio and Houston, Texas in the name of Peoples Club of Nigeria International (PCNI).

All legitimate members of the Club and the general public are hereby warned to disregard this group gathering and all their activities, as they are unauthorized, and thus illegal.

For the purpose of this communication, the group in Houston is led by Dr. Alphonsus Okpara, in San Antonio, Texas led by Professor Chuma Achebe, in New York led by Dr Morris Efobi and in San Francisco led by Dr Innocent Eke are hereby warned to cease and desist from such illegal and unlawful assembly or gathering in the name of Peoples Club of Nigeria International (PCNI) without express consent and approval from the Headquarters of the Club, duly signed by the President and the General Secretary – Chief Dr Sir J. I. Ilonze and Hon. Smart Ebere respectively.

You are hereby warned that any or attempted infringement of this trademark laws will have legal consequences. **You are warned!**

Signed:

  
Chief Sir Dr. J. I. Ilonze  
National President

  
Hon. Smart Ebere  
General Secretary

TRUSTEES: HRM Igwe P.C. Ezenwa, Chief J. O. Igwe, Chief E. N. Odinye, Chief I. Ojukwu Ike, HRM Igwe R.N. Nwankwo, Chief J.C. Okator, Chief F. N. Okezeanu  
Address all correspondence to the General Secretary  
honsmartebere@gmail.com (08066728872)

INTERROGATORY NO 10 -1

July 17, 2014

To: ALL PCNI BRANCHES  
ALL MEMBERS OF PCNI  
MEMBERS OF GENERAL PUBLIC

Re: Un-authorized use of the name of Peoples Club of Nigeria International posted by Chief Sam C. Iwuchukwu and Hon Alhaji A. N. Obinwa dated 16<sup>th</sup> July, 2014.

Chief Iwuchukwu and Alhaji Obinwa in a signed statement posted the following on the Internet:

"To be clear, Peoples Club of Nigeria International and Club Trademark Design registered in New Jersey USA under the President Emeritus and Patron Trustee Elect, Chief Fabian Onwuachu regime, belongs to all PCNI members... Thus, any legal action instituted by any person on the Trademark Design #86116372 shall be met by a counterclaim."

Let the public be advised that the premise of the declaration authored by Chief Sam C. Iwuchukwu and Hon Alhaji Obinwa is patently false and therefore their declaration as published on July 16, 2014 is erroneous in its entirety. Chief Sam Iwuchukwu whom I know cannot knowingly and publicly invite the public to violate the United States Trademark laws.

I hereby declare the following to the public knowing fully well that if my declaration is false I am subject to punishment:

1. That I, Dr. Iddi Mgbako, am the incorporator and the Agent of the Peoples Club of Nigeria International (PCNI).
2. That PCNI is registered in the United States with a Federal Identification Number and a bank account in New Jersey.
3. That the US Address of PCNI is 16 Wright St. Edison, New Jersey.
4. That there is no Club Trademark Design registered in New Jersey USA under Chief Fabian Onwuachu.
5. That the name PCNI and its 3 ring design with serial #86116372 is an approved trademark by the United States Government.
6. That any and all infringers of this trademark who are nonmembers of PCNI are hereby made aware of the serious consequences of the violation of the PCNI trademark reserved for use by only legitimate members of PCNI.
7. That the legitimate members of PCNI in the USA are members of one of our 17 branches who are part of the leadership core group (LCG) under the Chairmanship of Hon Bernard Osuagwu who are current with their SSS annual dues payment for the year 2013.
8. That those members who have either been suspended, expelled, or constitutionally rendered inactive due to nonpayment of SSS dues are

*Inter - No 10 - 2*

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PUBLIC NOTICE AND WARNING

Violation of Trademark Registration R 4,591,874

October 23, 2014

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Our attention has been drawn to a recent internet publication by Dr. Anayo Onwumere dated October 21, 2014 announcing the results of PCNI- Houston branch election recently conducted in Houston, Texas.

**The public should take note of the following:**

1. There is no election authorized by Peoples Club of Nigeria International in Houston, Texas as reported by Dr. Onwumere.
2. The so called election is a violation of PCNI Trademark Reg. No. 4,591,874 and carries with it severe legal consequences.
3. The legitimate Houston Branch of Peoples Club of Nigeria International operates under the leadership of Chief Obinna Mbachu, Chairman.
4. The election referred to by Dr. Onwumere is organized by former members of the club who have either been suspended or have withdrawn their membership on the club voluntarily as contained in a list of withdrawn members dated 23<sup>rd</sup> December, 2013 and signed by Chief Sir J.I. Ilonze, President and Hon. Elder Smart O. Ebere, General Secretary. This list can be verified by Chairman Mbachu.
5. Dr. Emmanuel Uzoma Opara is the only authorized National Officer permitted to publish recognized election results of PCNI in United States.
6. Any individual claiming to be a member of the Peoples Club of Nigeria International should be able to produce a current proof of the payment of Social Security Scheme signed by Hon Ebere, General Secretary. Any member who fails to produce such proof is an impostor.
7. Nonmembers who recently filed a petition to cancel the PCNI trademark are hereby warned that such a petition does not allow for continued violation of the trademark reserved for the use of members only.
8. There is only one Peoples Club of Nigeria International and no recognized divisions allowed by the Constitution of Peoples Club of Nigeria. The public can verify the status of their clients who claim membership on Peoples Club by contacting the Assistant National Publicity Officer, Dr. Emmanuel Uzoma Opara and the proof of payment of Social Security Scheme dues from Hon Smart Ebere required by the constitution to maintain membership.

*Int-e. No 10-3*

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unauthorized persons under the Trademark Laws and their gathering under the name and logo of PCNI is unauthorized and a violation of Federal Law.

9. That the public be advised that we have retained Trademark attorneys for enforcement of our trademark. Any individual who has a counterclaim should send the name of their attorney to our PCNI US Address for the purpose of our attorney communicating with their attorney and avoiding unnecessary litigation.
10. That the public be aware that the legitimate leaders of PCNI as elected in December 2013 are Chief Joe Ilonze, President and Hon Smart Ebere, Secretary.

Please direct all inquiries to:

PCNI Trademark Enforcement Group  
Peoples Club of Nigeria International  
16 Wright St.  
Edison, NJ 08820

Phone: 908-757-6456

Fax: 908-757-6476

Patron Dr. Eze Iddi Ambrose Mgbako, MD  
Trademark Agent, PCNI  
Papal Knight of St. Gregory the Great  
July 17, 2014

*Inker No 10-24*

# PEOPLES CLUB OF NIGERIA/INTERNATIONAL

**BANKERS:**  
PNC Bank  
Zenith Bank of Nigeria Plc.  
**CAC/IT/NO. 1295**  
**REGISTERED IN NIGERIA**  
**US SERIAL NO. 86116372**  
**REGISTERED IN UNITED**



**MOTTO: UNITY, LOVE & SERVICE**

**NIGERIA/INTERNATIONAL HEADQUARTERS:**  
Onitsha/Owerri Road,  
P.O. Box 5421  
Onitsha, Anambra State,  
Tel: 08037080187, 08066728872  
E-mail: peopleclubofnigeria@yahoo.com  
Website: www.peoplesclubofnigeria.com

## **PUBLIC NOTICE AND WARNING Violation of Trademark Registration R 4,591,874**

**November 5, 2014**

Our attention has been drawn to the lawsuit between New York City branch of People's Club of Nigeria International and Individuals claiming to be members of our club.

### **The public should take note of the following:**

1. The legitimate New York City Branch of Peoples Club of Nigeria International operates under the leadership of Chief Robert Ochiagha, Chairman.
2. Any individual claiming to be a member of the Peoples Club of Nigeria International should be able to produce a current proof of the payment of Social Security Scheme signed by Hon Smart Ebere, General Secretary. Any member who fails to produce such proof is an impostor.
3. There is only one Peoples Club of Nigeria International and no recognized divisions allowed by the Constitution of Peoples Club of Nigeria. The public can verify the status of their clients who claim membership on Peoples Club by contacting the Assistant National Publicity Officer, Dr. Emmanuel Uzoma Opara and the proof of payment of Social Security Scheme dues from Hon Smart Ebere required by the constitution to maintain membership.
4. The Peoples Club of Nigeria International is headquartered in Onitsha, Anambra State, Nigeria under the elected President, Chief Joe Ilonze. Any other individual claiming to be President is an impostor.
5. The public is hereby made aware by this public notice that certain members of Peoples Club of Nigeria International who were suspended or expelled or voluntarily withdrew their membership by not paying their constitutionally mandated annual Social Security Scheme dues continue to parade themselves to the public as members of Peoples Club of Nigeria International. This group of members is imposters.
6. The public is hereby advised to verify the status of individuals claiming membership on Peoples Club of Nigeria International by doing one of the following:
  - a. Contacting Hon Bernard Osuagwu, Chairman Leadership Core Group.
  - b. Hon Chief Dr. Onyekachi Okoru, Vice President, Peoples Club of Nigeria International.
  - c. Professor Emmanuel Uzoma Opara, Assistant National Publicity Secretary.
  - d. Eze Iddi Dr. Ambrose Mgbako, Agent, Peoples Club of Nigeria International and Trademark Enforcement Agent.
7. Legitimate enquiries to access verifying information on individuals or groups claiming membership on Peoples Club of Nigeria International can be directed to fax # 908-757-6476.
8. The Peoples Club of Nigeria International has a current and only registered trademark Registration R 4,591,874 which was published in August 2014 and for use of members only. It covers our name, our 3 ring symbol, and all applicable Internet addresses. All former members are prohibited from using our service marks.
9. The Attorneys acting on behalf of the purported members of Peoples Club of Nigeria International suing Chief Robert Ochiagha are hereby advised to verify the membership status of these individuals claiming to be members of the club. The first charter establishing the New York City branch has been cancelled and new charter issued to Chief Robert Ochiagha who is the current recognized Chairman of Peoples Club of Nigeria International New York City.
10. Any person doing business with nonmembers of Peoples Club of Nigeria who pretend to be members does so at his own risk. The public is hereby duty warned.

**Ambrose Mgbako, MD**  
**Trademark Enforcement Agent**

*10-11-14*  
*Ambrose Mgbako*

TRUSTEES: HRM Igwa P.C. Ezenwa, Chief J. O. Igwe, Chief E. N. Odilinye, Chief I. Ojukwu Ike,  
HRM Igwe R.N. Nwankwo, Chief J.C. Okafor, Chief F. N. Okekeanu  
Address all correspondence to the General Secretary  
honsmartebereatgmail.com (08066728872)

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### **NATIONAL /INTERNATIONAL OFFICERS**

President  
Chief Sir J. I. Ilonze

1st Vice President  
Chief Onyekachi O. Okoro

2nd Vice President  
Chief R. O. C. Ekedozie

3rd Vice President  
Chief Sam Nwigwe

National Secretary  
Elder Smart O. Ebero

1st Assistant National Sec.  
Chief C. C. Mojekwu

2nd Assistant National Sec.  
Lady Doris Anyador

Financial Secretary  
Chief Paulinus Onyenunoro

Legal Adviser  
Chief F. O. Onyebueke

Assistant Legal Adviser  
Barr. Okay Akpom

Publicity Secretary  
Capt. J. O. W. Onyema

Assistant Publicity Sec.  
Prof. Emma Opara

Protocol Office  
Chief Alvan Okoya

Assistant Protocol Officer  
Hon. Don Ibekwe

Welfare Officer  
Chief Law Major

Assistant Welfare Officer  
Chief Gody Oranbo

Assistant Welfare Officer  
Lady Rubby Nnadi

Assistant Welfare Officer  
Nze Bon Ikwuagwu

House Master  
Chief Martin Ezeike

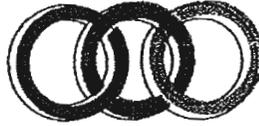
Assistant House Master  
Chief Ernest O. Ugorji

Assistant House Master  
Hon. Victor Ihezue

Assistant House Master  
Hon. Anane Okeke

# PEOPLES CLUB OF NIGERIA/INTERNATIONAL

**BANKERS:**  
PNC Bank  
Zenith Bank of Nigeria Plc.  
CAC/IT/NO. 1295  
REGISTERED IN NIGERIA  
US SERIAL NO. 86116372  
REGISTERED IN UNITED



MOTTO: UNITY, LOVE & SERVICE

**NIGERIA/INTERNATIONAL HEADQUARTERS:**

Onitsha/Owerri Road,  
P.O. Box 5421  
Onitsha, Anambra State,  
Tel: 08037080187, 08066728872  
E-mail: peopleclubofnigeria@yahoo.com  
Website: www.peoplesclubofnigeria.com

Our Ref: ..... Your Ref: ..... Date: .....

## NATIONAL INTERNATIONAL OFFICERS

President  
Chief Sir J. I. Ilonze

1st Vice President  
Chief Onyekachi O. Okoro

2nd Vice President  
Chief R. O. C. Ekedoze

3rd Vice President  
Chief Sam Nwagwe

National Secretary  
Elder Smart O. Ebere

1st Assistant National Sec.  
Chief C. C. Mojekwu

2nd Assistant National Sec.  
Lady Doris Anyador

Financial Secretary  
Chief Paulinus Onyenuforo

Legal Adviser  
Chief F. O. Onyebueke

Assistant Legal Adviser  
Barr. Okay Akpom

Publicity Secretary  
Capt. J. O. W. Onyema

Assistant Publicity Sec.  
Prof. Emma Opara

Protocol Officer  
Chief Avran Okoye

Assistant Protocol Officer  
Hon. Don Ibeke

Welfare Officer  
Chief Law Major

Assistant Welfare Officer  
Chief Gody Oranebo

2nd Assistant Welfare Officer  
Lady Ruby Nnadi

3rd Assistant Welfare Officer  
Nze Bon Ikwaagwu

House Master  
Chief Martin Ezeke

Assistant House Master  
Chief Ernest O. Ugorji

2nd Assistant House Master  
Hon. Victor Ihezue

3rd Assistant House Master  
Hon. Anane Okeke

## PUBLIC NOTICE AND WARNING

### Violation of Trademark Registration R 4,591,874 and Registered Corporate Name # 3616272 November 24, 2014

TO: Dr. Chief Innocent Ekeh, Professor Victor Dike, Mr. Bennie Onwuemeka.  
Mr. Humphrey Okeke and Ken Chika & ETC

The attention of the headquarters of people Club of Nigeria International Onitsha, Nigeria and the People Club of Nigeria International San Francisco (PCNI) Branch Inc., has been drawn to a public advert by some expelled former members of the Club informing the public of their purported planned Christmas party on Dec. 6<sup>th</sup> 2014 at Sacramento CA in the name of people Club of Nigeria International San Francisco branch Inc., Northern Ca.

#### The public should take note of the following:

The legitimate San Francisco Branch of Peoples Club of Nigeria International operates under the leadership of Chief David Ibeabuchi, Chairman and the Executives of the branch.

1. Any individual claiming to be a member of the Peoples Club of Nigeria International San Francisco Branch should be able to produce a current proof of the payment of Social Security Scheme signed by Hon Smart Ebere, General Secretary. Any member who fails to produce such proof is an impostor.
2. There is only one Peoples Club of Nigeria International San Francisco Branch and no recognized divisions allowed by the Constitution of Peoples Club of Nigeria. The public can verify the status of their clients who claim membership on Peoples Club by contacting the Assistant National Publicity Officer, Dr. Emmanuel Uzoma Opara and the proof of payment of Social Security Scheme dues from Hon Smart Ebere required by the constitution to maintain membership.
3. The Peoples Club of Nigeria International is headquartered in Onitsha, Anambra State, Nigeria under the elected President, Chief Joe Ilonze.

TRUSTEES: HRM Igwe P.C. Ezenwa, Chief J. O. Igwe, Chief E. N. Odilinye, Chief I. Ojukwu Ike,  
HRM Igwe R.N. Nwankwo, Chief J.C. Okafor, Chief F. N. Okekearu  
Address all correspondence to the General Secretary  
honsmartebereatgmail.com (08066728872)

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# PEOPLES CLUB OF NIGERIA/INTERNATIONAL

## BANKERS:

PNC Bank  
Zenith Bank of Nigeria Plc.

CAC/IT/NO. 1295  
REGISTERED IN NIGERIA  
US SERIAL NO. 86116372  
REGISTERED IN UNITED



MOTTO: UNITY, LOVE & SERVICE

## NIGERIA/INTERNATIONAL HEADQUARTERS:

Onitsha/Owerri Road,  
P.O. Box 5421  
Onitsha, Anambra State,  
Tel: 08037080187, 08066728872  
E-mail: peopleclubofnigeria@yahoo.com  
Website: www.peoplesclubofnigeria.com

Our Ref: ..... Your Ref: ..... Date: .....

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Chief Sr J. I. Itonze

1st Vice President  
Chief Onyekachi O. Okoro

2nd Vice President  
Chief R. O. C. Ekedozie

3rd Vice President  
Chief Sam Nwigwe

National Secretary  
Elder Smart O. Ebere

1st Assistant National Sec.  
Chief C. C. Mojekwu

2nd Assistant National Sec.  
Lady Doris Anyador

Financial Secretary  
Chief Paulinus Onyenuforo

Legal Adviser  
Chief F. O. Onyebueke

Assistant Legal Adviser  
Bar. Okay Akpom

Publicity Secretary  
Capt. J. O. W. Onyema

Assistant Publicity Sec.  
Prof. Emma Opara

Protocol Office  
Chief Ahan Okoya

Assistant Protocol Officer  
Hon. Don Ibeke

Welfare Officer  
Chief Law Major

Assistant Welfare Officer  
Chief Gody Oranebo

2nd Assistant Welfare Officer  
Lady Rubby Nnadi

3rd Assistant Welfare Officer  
Nze Bon Ikwaagwu

House Master  
Chief Martin Ezeke

Assistant House Master  
Chief Ernest O. Ugoji

2nd Assistant House Master  
Hon. Victor Ihezue

3rd Assistant House Master  
Hon. Anane Okeke

5. The public is hereby made aware by this public notice that certain former members of Peoples Club of Nigeria International San Francisco who were suspended or expelled or voluntarily withdrew their membership by not paying their constitutionally mandated annual Social Security Scheme dues continue to parade themselves to the public as members of Peoples Club of Nigeria International San Francisco branch. This group of former members or (individuals) is imposters.
6. The public is hereby advised to verify the status of individuals claiming membership on Peoples Club of Nigeria International San Francisco branch by doing one of the following:
  - a. Contacting Hon David Ibeabuchi, Chairman Peoples Club of Nigeria International San Francisco branch Inc., Northern California.
  - b. Contacting Hon Bernard Osuagwu, Chairman Leadership Core Group.
  - c. Hon Chief Dr. Onyekachi Okoro, 1<sup>ST</sup> National Vice President, Peoples Club of Nigeria International.
  - d. Professor Emmanuel Uzoma Opara, Assistant National Publicity Secretary.
  - e. Eze Iddi Dr. Ambrose Mgbako, Agent, Peoples Club of Nigeria International and Trademark Enforcement Agent.
7. Legitimate inquiries to access verifying information on individuals or groups claiming membership of Peoples Club of Nigeria International can be directed to fax # 908-757-6476.
8. The Peoples Club of Nigeria International has a current and only registered trademark Registration R 4,591,874 which was published in August 2014 and for use of members only. It covers our name, our 3 ring symbol, and all applicable internet addresses. All expelled former members are prohibited from using our service marks. They are prohibited from using our people's club of Nigeria San Francisco (PCNI) Corporate name registered with Secretary of State, State of

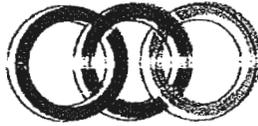
TRUSTEES: HRM Igwe P.C. Ezenwa, Chief J. O. Igwe, Chief E. N. Odilinye, Chief I. Ojukwu Ike,  
HRM Igwe R.N. Nwankwo, Chief J.C. Okafor, Chief F. N. Okekeanu  
Address all correspondence to the General Secretary  
honsmartebere@gmail.com (08066728872)

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Inlet No 7

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# PEOPLES CLUB OF NIGERIA/INTERNATIONAL

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 PNC Bank  
 Zenith Bank of Nigeria Plc.  
**CAC/IT/NO. 1295**  
**REGISTERED IN NIGERIA**  
**US SERIAL NO. 86116372**  
**REGISTERED IN UNITED**



**MOTTO: UNITY, LOVE & SERVICE**

**NIGERIA/INTERNATIONAL HEADQUARTERS:**

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 P.O. Box 5421  
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 Tel: 08037080187, 08066728872  
 E-mail: peopleclubofnigeria@yahoo.com  
 Website: www.peoplesclubofnigeria.com

**Our Ref:..... Your Ref:..... Date:.....**

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- President  
Chief Sr J I Ikonze
- 1st Vice President  
Chief Onyekachi O Okoro
- 2nd Vice President  
Chief R U C Ekeozie
- 3rd Vice President  
Chief Sam Nwagwe
- National Secretary  
Elder Smart O Ebere
- 1st Assistant National Sec  
Chief C C Mnjoku
- 2nd Assistant National Sec.  
Lady Dora Anyador
- Financial Secretary  
Chief Paulinus Onyendoro
- Legal Adviser  
Chief F O Onyebuoke
- Assistant Legal Adviser  
Bar. Okay Akpom
- Publicity Secretary  
Capt J O W Oyejima
- Assistant Publicity Sec  
Prof Emma Opara
- Protocol Office  
Chief Alvan Okoye
- Assistant Protocol Officer  
Hon Don Ibeke
- Welfare Officer  
Chief Law Major
- Assistant Welfare Officer  
Chief Goddy Orianebo
- 2nd Assistant Welfare Officer  
Lady Ruby Nnadi
- 3rd Assistant Welfare Officer  
Mrs Bon Ikwuagwu
- House Master  
Chief Martin Ezeike
- Assistant House Master  
Chief Ernest O Uyoji
- 2nd Assistant House Master  
Hon Victor Ibezie
- 3rd Assistant House Master  
Hon Anane Okeke

9. Any Company or individuals acting on behalf or doing business with the purported former members of Peoples Club of Nigeria International San Francisco Branch, (Namely Dr, Chief Innocent Eke, Professor Victor Dike, Mr. Bennie Onwuemeka, Mr. Humphrey Okeke and Ken Chika & ETC) are hereby advised to verify the membership status of these individuals claiming to be members of the club.
10. Dr. Innocent Eke and his group have refused to surrender the first charter establishing the San Francisco branch. Possession of the charter does not constitute membership in the Club.
11. These Corporate name and Trademark law breakers are hereby warned to cease and desist from further violation of US Trademark laws by unlawfully using club's trademark name, Logo and Corporate name to deceive and defraud the general public, without express authority from the People Club Of Nigeria International (PCNI) Trademark Agent in USA, Dr. Ambrose Mgbako and Corporate Name David Ibeabuchi, Chairman San Francisco Branch.
12. Any person doing business with nonmembers of Peoples Club of Nigeria who pretend to be members does so at his own risk. The public is hereby warned.

*Ambrose Mgbako, MD*

**Ambrose Mgbako, MD**  
**Trademark Enforcement Agent**

*Nov. 24, 2014*  
**Date**

**Cc: Mr. Ibrahim Measher (General Manager)**  
**Double Tree by Hilton Hotel**  
**Sacramento California**  
**2001 Point W Way**  
**Sacramento, CA 95815, US.**

**Phone: 916-929-8853 Fax: 916-614-3818**

**Email: [risa\\_ds@hilton.com](mailto:risa_ds@hilton.com) Director of Sales & Marketing: Nancy Vasquez**

TRUSTEES: HRM Igwe P.C. Ezenwa, Chief J. O. Igwe, Chief E. N. Odilinye, Chief I. Ojukwu Ike,  
 HRM Igwe R.N. Nwankwo, Chief J.C. Okafor, Chief F.N. Okekearu  
 Address all correspondence to the General Secretary  
 honsmartebere@gmail.com (08066728872)

*Inter No 8*

We ask our many members to be patient and understanding. The continued violation of our trademark will soon be gone.

Eze Iddi Ambrose Mgbako, MD  
Trademark Enforcement Agent  
Peoples Club of Nigeria International

*Inter 10-9*

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February 18, 2015

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Public Notice and Warning regarding the violation of the trademark of People's Club of Nigeria International by the dissolved Chicago Branch.

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The attention of the public has been drawn to the internet publication published February 16, 2015 of an election of officers of the Executive and Branch Board of Directors of Chicago Branch, Peoples Club of Nigeria International (PCNI).

The People's Club of Nigeria International dissociates itself from this publication for the following reasons:

1. The Chicago Branch of People's Club of Nigeria International was chartered by the Headquarters of PCNI in Onitsha on July 28, 2007 at the Comfort Suites O'Hare, 4200 North River Road, Schillei Park, Illinois and operated legitimately until the Chicago Branch was dissolved at the Annual General Meeting in Onitsha, Anambra State Nigeria in December 2013. "He who has the right to hire retains the right to fire."
2. As of December 2013, the Chicago Branch of PCNI ceased to exist. Those who claim to operate the so-called Progressive PCNI should know or should have known that there are no parallel groups of People's Club of Nigeria International recognized under the Nigeria Certificate of Incorporation of People's Club of Nigeria or the constitution of PCNI. It is fraudulent to project this alleged division of PCNI to the public.
3. The dissolved Chicago Branch is currently at the United States Trademark Board appealing their exclusion from the mark of People's Club of Nigeria International. This serious violation of our mark shall be brought to the attention of the Trademark Branch through our attorneys.
4. The Chicago Press Release of February 16, 2015 is a clear evidence that these former members are running a completely different organization with their branch Board of Directors which does not exist under the Constitution of PCNI.
5. The public are hereby warned that any individual or group dealing with the so-called Chicago Branch of PCNI does so at its own risk.

The nonmembers continuing to operate a nonexistent Chicago Branch of PCNI are hereby warned to cease and desist from continuing to do so. Violation of our trademark has its consequences under the law.

Ambrose Mgbako, MD  
Trademark Agent  
Trademark Enforcement Group  
People's Club of Nigeria International

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CAC/INCL



CORPORATE AFFAIRS COMMISSION  
FEDERAL REPUBLIC OF NIGERIA

COMPANIES AND ALLIED MATTERS DECREE No.1, 1990  
(PART C - INCORPORATED TRUSTEES)

**CERTIFICATE OF REGISTRATION**

Of the Incorporated Trustees of... ECOLESE CLUB OF NIGERIA

IT IS HEREBY CERTIFIED THAT  
(SEE PAGE 1401)

the duly appointed Trustees of... ECOLESE CLUB OF NIGERIA  
have this day been registered as a corporate body, subject to the below  
mentioned conditions and directions.

Given under the affixed common seal of the Corporate Affairs  
Commission at Abuja this day of 19TH JANUARY, 1997

I. K. PPL  
REGISTRAR GENERAL

**CONDITIONS AND DIRECTIONS**

"This Certificate is liable to cancellation should the objects or the  
rules of the body as set out in the Annexures hereto be changed without  
the previous consent in writing of the CAC or should the body at any  
time permit or condone any divergence from or breach of such objects  
and rules, or the body is dissolved under Section 691 of the Companies  
and Allied Matters Decree No.1, 1990."

Answer, no 16

THE TRUSTEES ARE:

1. JOHN W. BROWN
2. JOHN W. BROWN
3. JOHN W. BROWN
4. JOHN W. BROWN
5. JOHN W. BROWN
6. JOHN W. BROWN
7. JOHN W. BROWN
8. JOHN W. BROWN
9. JOHN W. BROWN
10. JOHN W. BROWN

List of Incorporating Trustees.

**SHOCKING! Ellen Lied!**  
 She Has Been Exposed For THOUSANDS OF YEARS!  
 THE WORLD She Has Lied For Years!

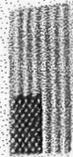
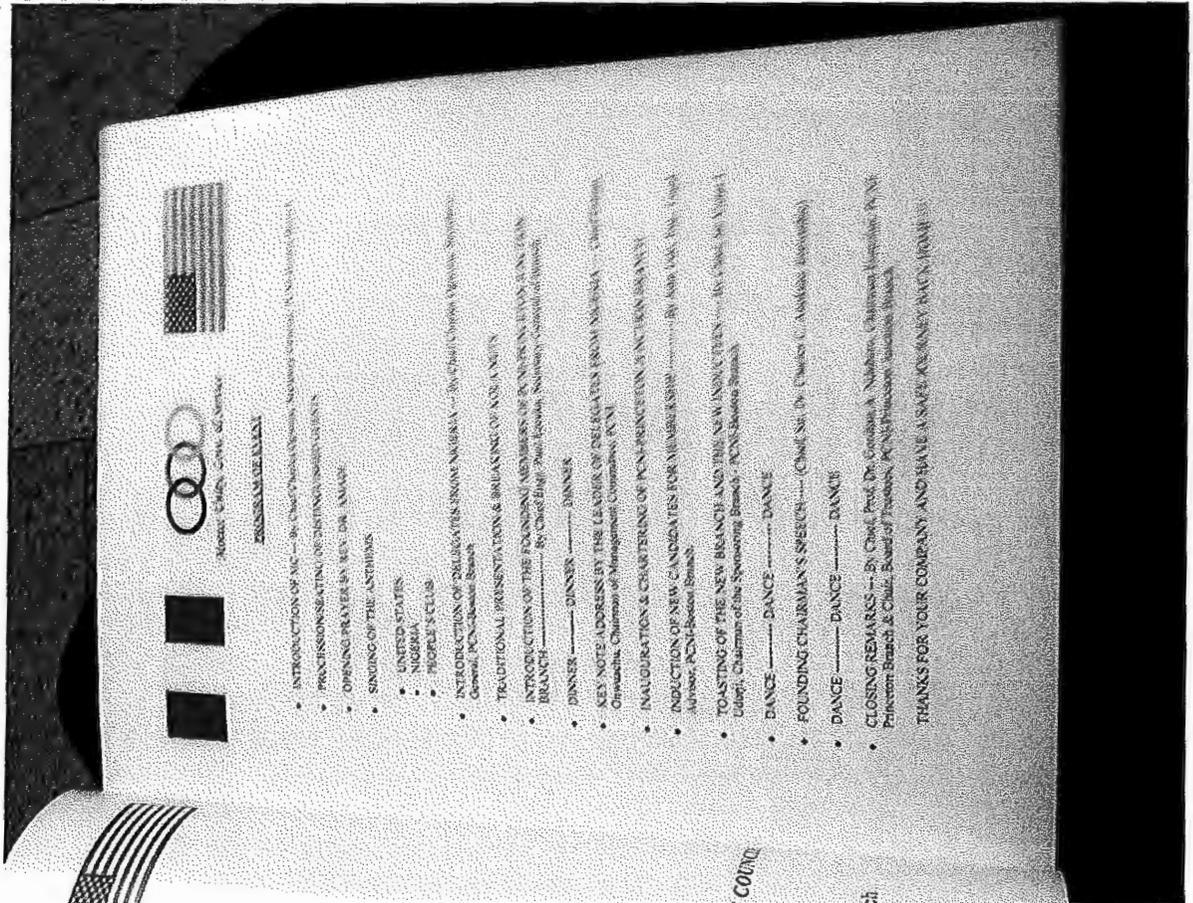
Subject: SHOCKING! Ellen Lied!  
 From: [Redacted]  
 To: [Redacted]  
 Date: [Redacted]  
 Size: [Redacted]  
 Type: [Redacted]



Answer, nu 14

ELLEN: IN 80 BONEY LURE!

The New York Times  
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AMERICAN SOCIETY OF MANAGEMENT CONSULTANTS

**PROGRAMME**

- INTRODUCTION OF THE NEW BRANCH AND THE NEW INDUCTION ..... By: Chief Charles Okeke, Managing Director, N. N. Associates (Pty) Ltd.
- PRACHEENKARATI, OR DISTINGUISHING THE BRANCH
- OPENING PRAYER BY REV. DR. AMARU
- SINGING OF THE ANTHEM
- UNITED STATES
- NIGERIA
- PEOPLE'S CLUB
- INTRODUCTION OF DELEGATION FROM NIGERIA ..... By: Chief Charles Okeke, Managing Director, N. N. Associates (Pty) Ltd.
- TRADITIONAL PRESENTATION & BREAKING OF NCA'S NYN
- INTRODUCTION OF THE FOUNDING MEMBERS OF PEN-PRESENTATION IN NIGERIA ..... By: Chief Charles Okeke, Managing Director, N. N. Associates (Pty) Ltd.
- BRANCH ..... By: Chief Charles Okeke, Managing Director, N. N. Associates (Pty) Ltd.
- DINNER ..... DINNER
- KEY NOTE ADDRESS BY THE LEADER OF DELEGATION FROM NIGERIA ..... Chief Charles Okeke, Managing Director, N. N. Associates (Pty) Ltd.
- INAUGURATION & CHARTERING OF PEN-PRESENTATION IN NIGERIA
- INDUCTION OF NEW CANDIDATES FOR MEMBERSHIP ..... By: Chief Charles Okeke, Managing Director, N. N. Associates (Pty) Ltd.
- TOASTING OF THE NEW BRANCH AND THE NEW INDUCTION ..... By: Chief Charles Okeke, Managing Director, N. N. Associates (Pty) Ltd.
- DANCE ..... DANCE
- DANCE ..... DANCE
- FOUNDING CHAIRMAN'S SPEECH ..... Chief Charles Okeke, Managing Director, N. N. Associates (Pty) Ltd.
- DANCE ..... DANCE
- DANCE ..... DANCE
- CLOSING REMARKS ..... By: Chief Charles Okeke, Managing Director, N. N. Associates (Pty) Ltd.

THANKS FOR YOUR COMPANY AND HAVE A SAFE JOURNEY BACK HOME!

Answers no 14

WHAT WAS THIS VIDEO BANNED? (0/0/0/0)

From: [Name]
To: [Name]
Subject: [Subject]
Date: [Date]
Time: [Time]



MEMBERSHIP ADDRESS:

MEMBER: THE MEMBERS OF THE NIGERIA PEOPLE'S CLUB INTERNATIONAL, INCLUDE THE PROMINENT LADIES AND GENTLEMEN.

IT IS WITH HONORARY MEMBERSHIP WITH YOU THAT I WELCOME YOU TO OUR INAUGURATION AND INAUGURATION CEREMONIES TOMORROW.

HUMILITY IN THAT WHICH ARE UNWARRANTED FOR ME TO EXPRESS THE PAIN WE WENT THROUGH TO BE HERE TONIGHT. INFACT I HAD TO TAKE AN IMPROPER DECISION TO SAN FRANCISCO TO FORESTALL THE EVIL MANIPULATIONS OF OUR DETRACTORS WHO WENT AS FAR AS TRYING TO PREVENT THE WELCOME DELEGATES FROM COMING HERE FOR THE EVENT TOMORROW, AND NOW IN FACT THIS IS A DREAM COME TRUE, DESPITE ALL ODDS.

IT WAS 10 YEARS AGO THAT WE GATHERED IN A PLACE LIKE THIS TO START A CLUB CALLED PEOPLE'S CLUB OF NIGERIA, PRECISLY BRANCHED THE CLUB HERE IN LAKE AND BOUND IN A VERY SHORT TIME, AND WAS DOING VERY WELL TILL 2004 WHEN IT WAS RELOADED TO NEWARK BY ONE OF THE WRONG PEOPLE WE RECRUITED BY MISTAKE, AND EVEN ELECTED AN OFFICER IN AN ATTEMPT TO MAKE THE CLUB, IN AN ELECTION CONDUCTED BY DELEGATES FROM CONTINUA.

BECAUSE ONCE BITTEN TWICE SHY, WE HAVE TAKEN OUR TIME THIS SECOND TIME AROUND TO RECRUIT A SELECT GROUP OF PERSONS WHOSE INDICTION WE ARE HERE TO WITNESS TOMORROW.

WE HAVE DONE OUR HOMEWORK VERY WELL THIS SECOND TIME AROUND AND WE THANKS TO THE SAME PEOPLE WHO FOUNDED THE DISPERSED PRECISION BRANCHED TEN YEARS AGO, IN THE PERSONS OF:

MY HONORABLE SELF, CHIEF DR. C.C. ANOKUTE, THE FOUNDING CHAIRMAN, PROFESSOR GORDIAN HUBERTU, THE CURRENT CHAIRMAN OF THE BOARD OF TRUSTEES, CHIEF ENG. PAUL EZEKINA, FOUNDING EXECUTIVE SECRETARY, CHIEF ALWELL, KESALALI, FOUNDING TREASURER, DR. PAUL OGBONNA, FOUNDING FINANCIAL SECRETARY, CHIEF DR. CHIEK OLANWU, TRUSTEE, DR. JUSTIN EKEJURU, TRUSTEE AND MAZI ORINTA OBI, TRUSTEE.

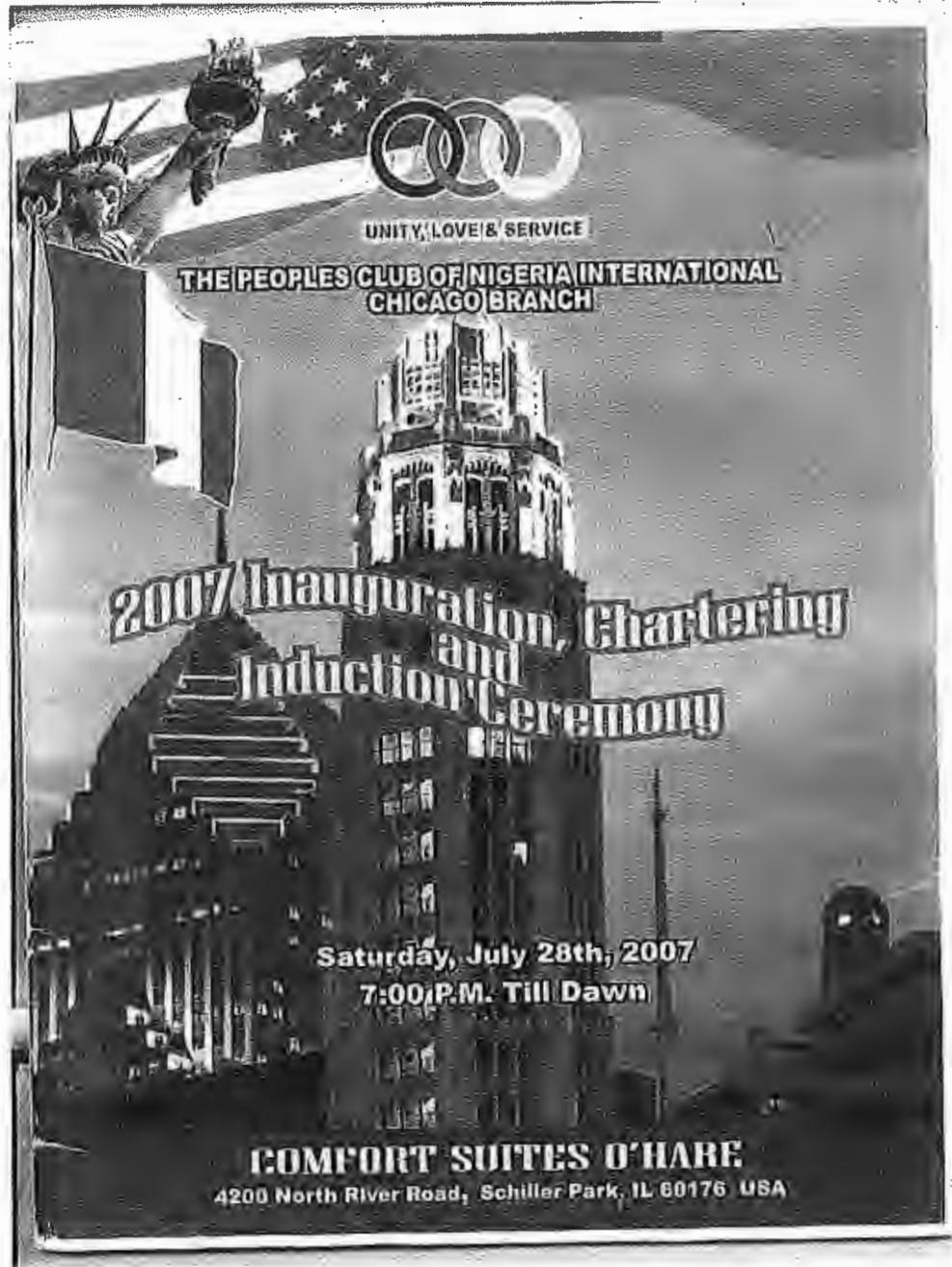
A SPECIAL THANKS TO CHIEF, ENGINEER PAUL EZEKINA, OUR ABLI SECRETARY WHO WORKED VERY HARD TO MAKE THIS EVENT THE BIG SUCCESS THAT IT IS TONIGHT.

WITH THE COLLAPSE OF PEOPLE LIKE THESE, ONE CANNOT GO WRONG IN TRYING TO RUN A FORTIFIABLE SOCIAL CLUB AND I HOPE TO INVITE YOU AGAIN TO CELEBRATE OUR ANNIVERSARY ONE YEAR FROM TODAY.

THANKS VERY MUCH INDEED FOR YOUR PATRONAGE AND GOD BLESS YOU, CHIEF DR. SIR CHARLES C. ANOKUTE, F.R.S.S.A., FELLOW OF THE ROYAL SOCIETY OF HEALTH, LONDON, DIPLOMATE IN INTERNATIONAL DIPLOMACY, U.S.A.

*[Handwritten signature]*

*Answer No 14*



*Answer no 19*



**PEOPLES CLUB OF NIGERIA INTERNATIONAL**

the sponsoring branch, PCNI Boston as required. On January 26, 2006, the club was incorporated in the State of Illinois and on October 31, 2006 the propose branch received a formal approval from PCNI HQ in Nigeria. The branch is inaugurated and chartered today July 28 2007 in Chicago, Illinois. ✓

Needless to say that today could not have been a reality, but for the unwavering support and love of Boston Branch Chairman, Chief/Sir Victor Udoji (K of C) (Akaekpichoma) of Adazi-Anni. Your deliberate efforts and constant communications with PCNI HQ have yielded the targeted results and today we are witnessing before our eyes the transmutation of the "Proposed. People's Club of Nigeria International (PCNI) Chicago Branch into the People's Club of Nigeria International (PCNI) Chicago with a conspicuous loss of the word Proposed". Chief / Sir Udoji, accept my sincere thanks.

I am not oblivious of the challenges ahead of us at this nascent stage, but with the help of crème of the society who are the founding and new members of this esteemed club, we will overcome these challenges and achieve the primary objectives of the PCNI. I say this with confidence because PCNI Chicago members encapsulate a personification of the PCNI Motto: "Love, Unity and Service". With the type of social cohesion, friendship, love and unity prevailing amongst the existing members in Chicago and proposed branch members, the sky is truly our limit. Our pledge is not only to be agents of growth and development of this club in Chicago, but also to the entire Mid West.

To CEC delegates, I bid you to please keep the light burning. We love and admire your life of sacrifice, love and abiding faith in the capacity of the club to change our world for the better. To our sponsoring branch, Boston, I say to you, do not worry we are now joined by an ethereal cord that cannot be easily severed. To our honorable founding new members, this is your day enjoy, savor and milk it and after today, go back to work because there is work to do. To our brothers and sisters who are part of this epoch-making event, join us; it will be the best thing to ever happen to your life.

I cannot conclude these remarks without acknowledging the tireless efforts of the organizing Org. Secretary PCNI Chicago, Mr. lyke Eziefula. Your sleepless nights have ensured that there is today. Also permit me to extend my appreciation to the all organizing officers especially in publicity department, the best man in the world, Mr. Best Anacle; you are truly a human machine, chairman of the inauguration committee (Hon. Dr. Paul Ujari), and sub-committee chairmen. It is no gain saying that without the hard work of these officers and committees today will not be a reality. My prayer is for the prevailing unity in the club to remain a permanent future that will be germane for building this club into a stallion amidst PCNI branches world wide

To all our guests, this is a day you will not forget in a hurry, so relax and savor this time with us; we are all in this together.

Thank you, all for honoring our invitation, may Almighty God keep and guide you safely back to your various destinations.

"Welcome"  
Long Live PCNI World Wide  
Long Live PCNI Chicago ✓

Hon. Dr. Anayo Ukeje (Agunwa).

Answer 2014

PEOPLES CLUB OF NIGERIA INTERNATIONAL

Program of Event

1. Introduction of Hon. MC Sir Engr. Iyke Okoro Sr. (The Peoples Social Thermostat)
2. Procession and Seating of Delegates
3. Opening Prayer
4. A moment of silence for our Founder, Chief T. I. Umezoke, Parents of the PCNI Chicago Chairman Nze E. J. Ukeje (Ejide Dike Noka) and Etinne Oguguo MaryAnn Ukeje
5. The national Anthems (USA, Nigeria & Peoples Club)
6. Introduction of CEC Delegates, Executives of Other Branches and Distinguished Guests
7. Libation and Breaking of Kola nuts
8. Dinner Dinner Dinner
9. Welcome Address by the sponsoring Chairman (Chief/Sir Victor Ulorji (K of C) Hon. Chairman PCNI Boston)
10. Key note Address by the National and International Chairman, Management Committee PCNI, Chief Fabian Omuwachu (Acharaugo, Osuofia Akokwi)
11. Inauguration & Chartering of Chicago-PCNI Branch
12. Introduction of the Chicago Chairman & His Executives by Chief/Sir Victor Ulorji (K of C) Hon. Chairman PCNI, Boston Branch and swearing in of the officers
13. Opening of the floor -----Leader of the CEC delegates
14. Address by Chicago Branch Chairman, Hon. Dr. Anayo Ukeje M. Ukeje (Agunwa)
15. Induction of New Members
16. Toasting the New Branch & the New Members
17. Celebration Dancing by the Chairman & his wife to be joined by his Executives & the newly inducted members
18. Presentation of new members & member Appreciations
19. Dance! Dance! Dance
20. Closing Remarks by the Vice Chairman, Chief Jeff Uju
21. Dance! Dance! Dance

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Answer no 14

**People's Club of Nigeria  
International  
PRINCETON JUNCTION  
NEW JERSEY USA BRANCH**

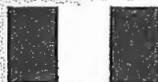


**Inauguration, Chartering &  
Induction of New Members**



**SATURDAY, JULY 21, 2007  
7:00 PM to 2:00 AM**

**PREMIERE HOTEL, PRINCETON, NEW JERSEY  
4355 ROUTE 1 PRINCETON, NEW JERSEY  
609-452-2400**



*Motto: Unity, Love, & Service*



*Answer no 14*

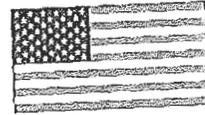
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Motto: *Unity, Love, & Service*



PROGRAM OF EVENT

- ◆ INTRODUCTION OF MC --- By Chief Charles Ogunni, Secretary General, PCNI-Boston Branch
  - ◆ PROCESSION SEATING OF DISTINGUISHED GUESTS
  - ◆ OPENING PRAYER BY REV. DR. AMADI
  - ◆ SINGING OF THE ANTHEMS
    - UNITED STATES
    - NIGERIA
    - PEOPLE'S CLUB
  - ◆ INTRODUCTION OF DELEGATES FROM NIGERIA --- By Chief Charles Ogunni, Secretary-General, PCNI-Boston Branch
  - ◆ TRADITIONAL PRESENTATION & BREAKING OF KOLA NUTS
  - ◆ INTRODUCTION OF THE FOUNDING MEMBERS OF PCNI-PRINCETON JUNCTION BRANCH ..... By Chief Engr. Paul Ezeaka, Secretary-General of Branch
  - ◆ DINNER ..... DINNER ..... DINNER
  - ◆ KEY NOTE ADDRESS BY THE LEADER OF DELEGATES FROM NIGERIA --- Chief Labian Oluwachu, Chairman of Management Committee, PCNI.
  - ◆ INAUGURATION & CHARTERING OF PCNI-PRINCETON JUNCTION BRANCH
  - ◆ INDUCTION OF NEW CANDIDATES FOR MEMBERSHIP ..... By John Udo, Esq., Legal Advisor, PCNI-Boston Branch.
  - ◆ TOASTING OF THE NEW BRANCH AND THE NEW INDUC TEES --- By Chief, Sir Victor I. Udeji, Chairman of the Sponsoring Branch - PCNI-Boston Branch
  - ◆ DANCE ..... DANCE ..... DANCE
  - ◆ FOUNDING CHAIRMAN'S SPEECH --- (Chief, Sir, Dr. Charles C. Arokate, Ezewuthie)
  - ◆ DANCE ..... DANCE ..... DANCE
  - ◆ CLOSING REMARKS --- By Chief, Prof. Dr. Gordian A. Ndubizu, Chairman Emeritus, PCNI-Princeton Branch & Chair, Board of Trustees, PCNI-Princeton Junction Branch
- THANKS FOR YOUR COMPANY AND HAVE A SAFE JOURNEY BACK HOME!!!

*Answer to  
14*



Motto: *Unity, Love, & Service*



**CHAIRMAN'S ADDRESS**

HONOURABLE MEMBERS OF THE NIGERIA PEOPLE'S CLUB INTERNATIONAL,  
DELEGATES FROM NIGERIA, LADIES AND GENTLEMEN.

IT IS WITH HUMILITY MINGLED WITH JOY THAT I WELCOME YOU TO OUR  
INAUGURATION AND INDUCTION CEREMONIES TONIGHT.

HUMILITY IN THAT WORDS ARE INNADEQUATE FOR ME TO EXPRESS THE HASSLE WE  
WENT THROUGH TO BE HERE TONIGHT. IN FACT I HAD TO TAKE AN IMPROMPTU REO  
EYE TO SAN FRANCISCO TO FORSTALL THE EVIL MACHINATIONS OF OUR  
DETRACTORS WHO WENT AS FAR AS TRYING TO PREVENT THE NIGERIAN  
DELEGATES FROM COMING HERE FOR THIS EVENT TONIGHT, AND JOY IN THAT THIS  
IS A DREAM COME THROUGH, DESPITE ALL ODDS.

IT WAS 10 YEARS AGO THAT WE GATHERED IN A PLACE LIKE THIS TO START A  
CLUB CALLED PEOPLE'S CLUB OF NIGERIA, PRINCETON BRANCH. THIS CLUB GREW  
IN LEAPS AND BOUNDS IN A VERY SHORT TIME AND WAS DOING VERY WELL TILL  
2004 WHEN IT WAS HIJACKED TO NEWARK BY ONE OF THE WRONG PEOPLE WE  
RECRUITED BY MISTAKE, AND EVEN ELECTED AN OFFICER IN AN ATTEMPT TO YAME  
THE SHREW, IN AN ELECTION CONDUCTED BY DELEGATES FROM ONIASHA.

SINCE ONCE BITTEN TWICE SHY, WE HAVE TAKEN OUR TIME THIS SECOND TIME  
AROUND TO RECRUIT A SELECT GROUP OF PERSONS WHOSE INDUCTION WE ARE  
HERE TO WITNESS TONIGHT.

WE HAVE DONE OUR HOMEWORK VERY WELL THIS SECOND TIME AROUND AND MY  
THANKS TO THE SAME PEOPLE WHO FOUNDED THE DEFUNCT PRINCETON BRANCH  
TEN YEARS AGO, IN THE PERSONS OF:

MY HUMBLE SELF, CHIEF, DR. C.C. ANOKUTE, THE FOUNDING CHAIRMAN,  
PROFESSOR GORDIAN NDURUMU, THE CURRENT CHAIRMAN OF THE BOARD OF  
TRUSTEES.

CHIEF, ENG. PAUL EZEUKA, FOUNDING EXECUTIVE SECRETARY,  
CHIEF ALLWELL EZEALAJI, FOUNDING TREASURER,  
DR. PAUL OGBONNA, FOUNDING FINANCIAL SECRETARY,  
CHIEF, DR CHIKE OBIANWU, TRUSTEE,  
DR JUSTIN EGEJURU, TRUSTEE AND  
MAZLOBINTA OBI, TRUSTEE.

A SPECIAL THANKS TO CHIEF, ENGINEER PAUL EZEUKA, OUR ABLE SECRETARY  
WHO WORKED VERY HARD TO MAKE THIS EVENT THE BIG SUCCESS THAT IT IS  
TONIGHT.

WITH THE CALIBRE OF PEOPLE LIKE THESE, ONE CANNOT GO WRONG IN TRYING TO  
RUN A FORMIDABLE SOCIAL CLUB AND I HOPE TO INVITE YOU AGAIN TO  
CELEBRATE OUR ANNIVERSARY ONE YEAR FROM TODAY.

THANKS VERY MUCH INDEED FOR YOUR PATRONAGE, AND GOD BLESS YOU.  
CHIEF, DR. SIR CHARLES C. ANOKUTE, PH.D. U.S.A., FELLOW OF THE ROYAL SOCIETY  
OF HEALTH, LONDON, DIPLOMATE IN INTERNATIONAL DIPLOMACY, U.S.A.

*Answer No  
14*



## PEOPLES CLUB OF NIGERIA INTERNATIONAL

*Welcome Remark by Dr. Anayo Michael Ukeje (Agunwa),  
Founding Chairman People's Club of Nigeria International (PCNI)  
Chicago Branch, Illinois, USA.*

His Royal Highness/Majesty, Igwes, Ndi Eze, Nze na Ozo, the Chiefs, the Central Executive Committee (CEC) of People's Club of Nigeria International, the Honorable Chairman of our esteemed Club from Boston and the sponsoring Chairman PCNI Chicago Branch Chief, Sir Victor Udoji (K of C) (Nwamurugbaegbe, Urualla), PCNIUSA Chairmen and Secretaries, delegates from all PCNI Branches, my rocks-the honorable and new members of People's Club of Nigeria International (PCNI) Chicago Branch Illinois, USA, Ladies and gentleman, all protocols observed.

I wish to start by extending my warmest "welcome" to CEC delegates who traveled thousands of miles to be here today. I equally want to "welcome" all the PCNI-USA delegates, guests, friends and well-wishers from all over United States of America who have gathered here tonight to witness an epoch event of "Inauguration, Chartering and Induction of new members of People's Club of Nigeria International (PCNI) Chicago Branch, Illinois, USA.

Today, July 28, 2007, is indeed a memorable day that will leave an indelible mark in the sand of time not only for the Nigerian community in Chicago, Illinois but the entire Nigerian community in Mid Western region of United States of America. For me today was long in the making as it started as an innocent observation of the life activities of a self made and very successfully businessman Chief Fabian Acharaugo Onwuachu, Osuofia Akokwa, the National and international Chairman PCNI Management Committee. As an observer, I was interested in his caring, social and philanthropic activities but what got me into Peoples Club today is the unquantifiable tenure of Chief Onwuachu as the National Social welfare Committee Chairman of PCNI, which the elders and founders of the club remembered when PCNI was at crossroads and needed the best of the best to rescue the club. The forgoing leaves no doubt why Chief Onwuachu is today occupying the prestigious position of the National and International Chairman PCNI Management Committee. His quest to be the best in whatever field of endeavor he found himself and his tenacious disposition shaped my life in many ways.

Thus, when I arrived in USA in 2003, the first question I asked Chief Ezeji is whether there is a People's club branch in Chicago and he answered in the negative. In 2004, six PCNI members residing in Chicago were inducted in Boston Branch namely Chief Emeka Ibekwe, Dr. Jude Nwokenkwo, Felix Oguebor, Sadiq Ademola, Harold Molokwu and Nkendiche Nwade. However, these 6 existing PCNI members could not organize Chicago Branch as required by the PCNI constitution due to intractable differences. Thus I singularly commenced this long and odious journey that brought us here today by tactful approach and exhaustive consultations of the main protagonists named above.

These efforts paid off on Saturday November 12, 2005 when the inaugural meeting of proposed PCNI Chicago was convened after I have secured assurances that the then prevalent political atmosphere will not be allowed to play any part in the organization and establishment of the first PCNI Branch in entire Mid-Western region of USA. My love to conveners of this inaugural meeting of the proposed club (Chief Erasmus Ezeji, Chief Dan Ibekwe and of course Dr. Ukeje Anayo Ukeje) for their unrestrained sacrifice that culminated to convening the meeting, passing resolutions that created fertile ground for consultations with the Honorable Chairman of the Club in Boston and the sponsoring Chairman PCNI Chicago Branch Chief, Sir Victor Udoji (K of C), (Ugballa of Eziudo Mbaise) and requesting him to petition ICNI HQ on our behalf as required. Consultations and discussions with both Boston and Nigeria continued until another group of 5 foundation PCNI members from Chicago were inducted in Boston, 2006, namely Chief Jeff Uju, Dr. Paul Ujari, Chief Erasmus Ezeji, Mr. Emeka Uhuka and of course Dr. Anayo Ukeje.

In a nutshell, the "Proposed Chicago Branch of the PCNI was convened on Saturday November 12, 2005; On November 26, 2005 it applied to be affiliated to Peoples Club of Nigeria International headquarters in Nigeria via



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Answer 20/14



# the three rings

Vol. 1 No. 3 July - September 1988 The In-House Newsletter of Peoples Club of Nigeria ISSN 0795-2201

## EDITORIAL

### Encourage Indigenous Exporters

Recently an indigenous company owned by Chief Josiah Nnoruka blazed a new trail in the manufacturing sector by exporting his company's finished product to a First World Market.

Chief Nnoruka's Roadmaster Industries Limited based in Onitsha, manufactured and exported wheel-barrow tyres to Japan. What dumbfounded Nigerians and the world at large was that Japan, regarded as saturated in every manufacturable equipment, was ready to accept wheel-barrow tyres from a Third World Country. This goes to show that the Third World Countries still have a chance in export trade if only they can bend backwards and perfect their technology and the quality of their products.

For very many years, importation and exportation business between Japan and Nigeria have been tilting disgustingly in the interest of Japan. Statistics have always shown that Japan has exported several millions of naira (if not billions now) worth of goods to Nigeria, while Nigeria exports only a few thousand naira worth of raw materials in return.

The current export of wheel-barrow tyres will help in bridging the yawning gap in the balance of trade between Japan and Nigeria. We call for more indigenous companies and industrialists to emulate the example demonstrated by Roadmasters Industries Limited.

With this type of international export of manufactured goods, Nigeria is bound to improve on her balance of payment situation and earn more foreign and hard currency for the country. Certainly some of the goods will also be on sale in the local market

(Contd. on page 7)

# PEOPLES CLUB OF NIGERIA GOES INTERNATIONAL

Peoples Club of Nigeria now goes international. is free to choose any religion or hold any political belief", he said.

This followed the initiation into the club of 45 new members, 10 of which were members resident in the United States of America during the 5th Induction Ceremony of the Owerri Branch held on September 10, 1988.

Highlights of the ceremony was the official opening of the club's new lawn tennis court; and the launching of the finishing phase of the club's \$2 million Ultra Modern Guest House.

The 10 new members from US are expected to form the nucleus of the Peoples Club of Nigeria abroad.

Addressing the new inductees the National President, Chief Dr. C.N. Obloha, (Akajugo - Arondizuogu) charged them to be prepared to serve humanity and the nation.

Chief Obloha declared; "Service rules the organisation. Service to members, service to the community", pointing out that neither religion nor politics was the concern of the club. "One



Chief Dr. C.N. Obloha

The President added that one must gird one's loins and serve the nation and humanity in truth and justice. "To be serviceable, he said, is to be godly and to be godly is the highest state of man".

He advised them to acquaint themselves with the club's social security scheme (S.S.S.), adding that whatever benefits they would derive for being members of the club depended on their regular attendance at club activities and strict adherence to club regulations.

Earlier in his address, the chairman of the branch

Contd. on page 8

## Investment Committee To Be Set Up

An Investment Committee that will review the investment pattern of the Peoples Club of Nigeria is to be established.

This is one of the five-point communique adopted after the second seminar held at Onitsha by members of the Peoples Club of Nigeria on Saturday August 20, 1988.

The seminar whose theme was "Stability and Growth through Effective Social Security Administration" was attended by members from all the 22 branches of the club throughout the federation.

The first seminar with the theme - "The Role of The Peoples Club of Nigeria, In National Development" was held in May 1985.

The last Onitsha seminar agreed among other things on the expansion of the Social Security Scheme so that members would derive

benefits whilst alive.

It also decided in principle, on setting up craft/trade centres. Details, according to the communique, would be worked out later.

Directives were given to branches on the membership development programme on improving the organisation and administrative capacities.

These, according to the communique include: (a) The completion and improvement of club house facilities;

(b) Establishment of programmes which would stimulate the participation of members; (c) Special local inductions of quality members without much publicity should be encouraged in order to accommodate such quality members to join the club.

On S.S.S., the seminar emphasized that payment should be made by the members in the branches which will in turn pay same to the National Headquarters as early as possible in each quarter. But this should not be later than the end of the second month in each quarter, after which sanctions would apply.

Branches, the communique said, might open separate account for the SSS and endeavour to build up reserves in the account.

Penalties and fines at the branch level should be reduced to avoid accumulated debts and thus



H. R. H. Eze C.N. Nnoruka and his wife were among the inductees at the 5th induction ceremony. See story on back page.

Answer No 14



MONO: UNITY & LOVE

# the three rings

Vol. 1 No. 4 October — December 1988 The In-House Newsletter of Peoples Club of Nigeria ISSN 0785-2201

## EDITORIAL

### Blazing The Trail

There are now hundreds of social clubs in Nigeria. However, one of them stands out, unrivalled, as the premier Indigenous social club, with the widest public appeal in the country. That club is the PEOPLES CLUB OF NIGERIA.

Within a few years of its inception in 1971 to be precise, 22 branches of the Peoples Club have been established throughout the length and breadth of Nigeria, most of them with hundreds of members. Since admission is open to Nigerians of all ethnic origin and religious beliefs, it is easy for branches to spring up and thrive in most states and major cities of the Federation.

So popular has the Peoples Club become; so satisfying its social and fellowship programmes; so enabling its philanthropic contributions to the upliftment of society and comfort of the under-privileged, that an ever-increasing number of high quality citizens in Nigeria and abroad are now seeking information on how to join the Peoples Club. In addition to the well established businessmen and women and natural rulers who consulted the initial membership, more and more professionals and intellectuals — engineers, lawyers, journalists, accountants, sociologists, medicals, university dons etc., are joining.

One of the most interesting of current developments is the interest being shown in the Peoples Club by well established Nigerian business class and intellectuals living overseas. They have identified the club as the only indigenous social club whose philo-

(Contd. on page 6.)

## GOING INTERNATIONAL —

# PCN TO TAKE OFF IN TEXAS

THE Peoples Club of Nigeria has completed all arrangements to establish a branch of the club in the United States of America. This followed a tentative approval granted by the National Executive Committee of the club held in Port Harcourt recently for the establishment of a branch abroad.

This was contained in the address by the National President, Chief Dr. C.N. Obioha (Akajugo — Arondizuogu) at the induction ceremony of the Peoples Club of Nigeria, Kaduna branch, on Saturday, November 12, 1988.

Chief Obioha said that

reports received so far from Houston Texas, raised hopes that in no distant date the branch would receive its charter to operate as a full branch.

He declared: "The foundation of the club is based on the ideals of truth, justice, fairplay, love and service. It aims to give concrete realisation of 'our

brothers' keepers' and encompassing concepts embracing all Nigerians and therefore a strong force for national unity and concord."

The occasion also marked the tenth anniversary celebration (1978-1988) of the Kaduna branch and the unveiling of the statue of the former chairman of the

branch, late Chief E.M. Oputun. Twenty-five new members, including a woman, were inducted into the Club.

In his speech, the President charged the new inductees to abide by the rules and regulations as entrenched in the Club's constitution. He told them to uphold the noble ideals of the Club by being good citizens of "our great country, Nigeria", responsible and disciplined members of their respective communities — not yielding to the vices that had bedevilled the society.

Chief Obioha elucidated on the symbolic meaning of the club's emblem — the multicoloured intertwined three rings. These he described as teaching Humility, Faith and Togetherness.

The National President later cut the tape to open the club hall extension built at the cost of ₦250,000.00, and also unveiled a beautiful bust statue of the founding Chairman of the branch, late Chief Oputun, the Ekweme I of Iru, outside the hall.

Ten founding members of the branch added glamour to the celebration when they blew out each a candle in turns to mark the tenth anniversary of the existence of the branch.

Earlier, in his well speech, the Chairman

Kaduna branch

Chris S.O.

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New inductees in Kaduna take the oath of allegiance

## Chief Odili Becomes A Patron

History was created at Ife Ukpou in Nipokola Local Government Area of Anambra State on December 3rd 1988 when the Odu Ife Ife Ukpou Chief Elias N. Odili was installed a national patron of the Peoples Club of Nigeria.

Almost all the national patrons of the club national officers and members throughout the federation graced the occasion with their presence. It was really the patrons'

day as they added colour and dignity to the festivity, each one with his gold-plated staff of office moving majestically to greet the new patron.

In his address before presenting the new patron with his certificate, the National President of the club, Chief (Dr.) C.N. Obioha (Akajugo — Arondizuogu) charged him to always bear in mind his contributions to the club must be positive and not negative.

He declared: "You will not in any way promote and diverse role within the club. Neither will you encourage any pursuit for personal

gains. You are to play a festive role always and do not lose touch with the grassroots of our noble club".

Chief Obioha said that "a patron is a national officer for life." He urged all officer members to contribute both financially and materially towards the club house sports centre at the headquarters.

The Founder, Prince E.I. Umefofoke (Olayinka I of Anshij) recalled the contributions of Chief Odili to the club and congratulated him for all his efforts and contributions.

(Contd. on page 8)

Answer No 14

AN ADDRESS DELIVERED BY CHIEF I.O. NWAODU  
CHAIRMAN PEOPLES CLUB OF NIGERIA OWERRI BRANCH  
(SPONSORING BRANCH) AT THE ANNIVERSARY AND  
PRESENTATION OF THE HOUSTON BRANCH TO THE  
NATIONAL BODY OF PEOPLES CLUB OF NIGERIA IN  
HOUSTON TEXAS U. S. A.

The President,  
Special Guest of Honour,  
The Founder, the Father,  
The National Secretary,  
The Special Invites,  
The Chairman Houston Branch,  
Executive & members of Houston Branch,  
Very Distinguished Ladies & gentlemen.

With joyful hearts and gratitude to God that we are here to grace this occasion today. Today's occasion is exclusively a landmark in the history of People's Club of Nigeria in general and Owerri Branch of People's Club of Nigeria in particular. Owerri Branch of People's Club of Nigeria have continuously been serving as a major source of inspiration to People's Club of Nigeria. We pray that God will always be with us and the branch we sponsor. The honour of sponsoring a new branch of People's club of Nigeria is not a small task; Owerri Branch sponsored Orlu Branch, the club that won the best branch-price in the Club last year at the National headquarters Onitsha.

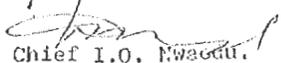
As God-father to Houston Branch, the Club will be rest assured that you will do better and keep the Ethics of the Club. People's Club of Nigeria is not a town union and cannot associate herself with ugly behaviour or any sabotage to the rule of Government in the area it operates. Give service to yourself, to your neighbours and the government of the day. As your God-father, we will be free to advice you when in need. You, on your path will honour us by not letting the membership-certificate, the charter certificate and all the regalia of People's Club down. The club will not be happy with you if you do that.

At your inauguration, 26th May last year you invited me to come and discharge this assignment of introducing you to the National President. but due to communication gap we could not get through at the American Embassy in Nigeria because Visa was not granted to me. I thank God today that with your letter of invitation to me faxed to the Embassy in Nigeria I am a proud possessor of American Visa hence my presence at this occasion.

The National President, the founder, the father, the Secretary, on behalf of myself, the Executive and members of Peoples Club of Nigeria Owerri Branch (the sponsor), humbly and sincerely hand you over the twenty-third member in the family of Peoples Club of Nigeria Branches, to our dear President. We are the first to sponsor a Branch of the Club while flying on the mission on going international.

Thanks God for the history.

Yours faithfully,

  
Chief I.O. Nwaodu.  
(CHAIRMAN).

Answer No 14

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PEOPLES CLUB OF NIGERIA

ADDRESS BY THE NATIONAL PRESIDENT, CHIEF (DR)  
C.M. OBILOHA ON THE OCCASION OF THE FIRST ANNIVERSARY  
CELEBRATION OF THE PEOPLES CLUB OF NIGERIA USA BRANCH ON  
SATURDAY 25TH MAY, 1991

Mr Chairman, Mr Ineanyi O. Agwocha -- Chinyere Ugo 1 of Ogwa  
Trustees/Patrons  
Founder  
The National Lord  
Father  
National Officers  
Members of the National Executive Council of our great Club  
Distinguished guest  
Ladies and gentlemen

It is with great pleasure that I, on behalf of the People Club of Nigeria send you felicitations. Circumstances beyond my control has made it impossible for me to be present physically.

The cooperation of the Anambra State Liaison Officer is very much appreciated. He facilitated the process of obtaining visas for the Representatives of the Peoples Club of Nigeria.

✓ The purpose of the visit of this delegation is to regularise the establishment and the granting of the Charter to the Houston branch of the Peoples Club. Secondly, to issue certificates to the members who were inducted last year.

✓ At this point, I must express my appreciation for the performance of Chief F F B C Nwankwo, Chief C.A. Chukelu, Chief Okonkwo Mangrover, Chief (Mrs) Vero Onyia and Chief Vin Onyenora, at the ceremony of 26th May, 1990.

The Peoples Club of Nigeria was founded in 1971 by Nigerians who were impelled by the desire to foster good relationship amongst mankind and to sponsor and promote charitable and philanthropic causes, ventures, and projects. Membership is open to all irrespective of race, religion or tribe. The club is non-political.

The Club has 22 branches in Nigeria and a well established National Secretariat at Onitsha, Anambra State of Nigeria. The branches are spread as follows:-- Iba, Abakaliki, Abuja, Asaba, Awka, Bauchi, Benin, Calabar, Enugu, Ibadan, Jos, Kaduna, Kano, Lagos, Maiduguri, Makurdi, Nnewi, Onitsha, Orlu, Owerri, Port-Harcourt and Warri.

Our membership strength encompasses men and women of proven integrity in various walks of life. Namely - doctors, engineers, accountants, lawyers traditional rulers, traders, civil servants etc.

*Answer no 14*

000030

The club provides a forum of equality that recognises individual talents and contributions. Thereby emphasising our interdependence to one another as no man can be an island unto himself. The tolerant and classless forum void of elitist snobbery tends to generate a buoyant and healthy society in which the members have mutual trust and respect for one another irrespective of their various stations in life.

The establishment of a branch of our club in the United States of America is a milestone in our quest to carry the gospel of our socio-philanthropic objectives to all parts of the world. Therefore, I charge you members of this new branch to uphold the noble ideals of this club and keep the flag of the club at all times flying.

We expect you as members of the club to be highly disciplined. You will abide by the rules and regulations as entrenched in the constitution of the club. You will uphold the noble ideals of the club by being good citizens and able ambassadors not yielding to the vices that have brought untold perils to the society.

You will acquaint yourselves with the workings of the social security scheme (SSS). You will participate in the Club's endowment fund activities. We, the members of the Peoples Club of Nigeria, will strictly continue to show the world that we have a proper and true sense of direction not based on affluence. If we have to play our part on a scale much larger than we have envisaged, we must ensure that we make more efficient use of our RESOURCES at all times. It stands therefore, to reason that Peoples Club of Nigeria has its obligation to mankind. We call on men and women of goodwill all over the world to join hands with us to ensure that this club survive the test of time and will remain a legacy for ourselves and future generations.

#### CHARGE TO OUR MEMBERS

May I specially congratulate you on having been found fit and proper persons to be members of this great club. To this end, you will abide by the rules and regulations as entrenched in the club's constitution. You will uphold the noble ideals of this club by being good citizens of the country, in which you reside; responsible and disciplined members of your respective communities.

You will acquaint yourself with the club's social security scheme. I will emphasise that the benefit you derive for being a member of this club will depend on your regular attendance to club activities, and strict adherence to club regulations.

I will now address you on the symbolic meaning of the emblem of the club -- the multicoloured intertwined rings of three. First,

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000031

none of the rings has a beginning or an end. This symbolizes life itself. No one knows where and when it started, nor the end. It therefore, teaches HUMILITY, and unquestioned belief in a deity by whatever name one might choose to address him. It also teaches FAITH. One must have a firm belief that there is a meaning in life and to each and everyone of us is a special assignment, which is one's lot. The three rings intertwined teaches one TOGETHERNESS; no one is an island unto oneself. From our very entry into this world to our exit, we interact with others. Our success or failure depends on the perception others have of us and therefore the extent to which a helping hand might be extended to us. The Peoples Club of Nigeria expects each member to be productive. To produce is not only to take care of one's family responsibility but also to produce enough to extend to the hungry and unfortunate ones.

The club is not purely a temporal association. It does not begin and end with the living. The care and concern of members for those left behind; the interment of the member signifies the continuity of the membership even beyond this conscious existence. Service rules the organisation. Service to members, service to the community. Neither religion nor politics is the concern of the club. One is free to choose any religion or hold any political belief. But one must gird one's loins and serve the nation and humanity in truth and justice. To be serviceable is to be godly and to be godly is the highest state of man. I therefore, recommend to you the new members this definition of "PEOPLES" CLUB:

- P - stands for -- pride of race and nation
- E - stands for -- example which we must show by our lives
- O - stands for -- otherness or togetherness - binding us one to another
- P - stands for -- productivity -- for we are "workmen" in the vineyard of the Lord
- L - stands for -- Love -- the cornerstone of the club and the greatest attributes of Almighty
- E - stands for -- eternity -- reminding us of the departed fellow members
- S - stands for -- service -- the very essence of life and the epitome of creation.

May I once again congratulate the chairman, Mr Iheanyi O Aguocha and the entire members in US who have worked so hard to establish this club in this part of the world. We at the national headquarters in Nigeria will continue to watch your leadership role with keen interest.

We also thank all those who have contributed in one way or the other to making this occasion a reality and pray the Grand Geometrician of the Universe to guide us all safely back to our destinations.

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May our labours begun in order be continued in peace and  
be ended in harmony.

Long live the United States of America  
Long live the Federal Republic of Nigeria  
Long live the Peoples Club of Nigeria

Thank you.

Chief Dr C E Obioha  
(Akaji-Ugo - Arondizuogu)  
Ononaku of Orlu  
Ugo-Ihedi-Obenna 1 of Aba  
Aka-na-eneoghe Obodo of Oru, Ahiara  
Ogwulire of Nguru, Mbaise  
Ozuruiabo of Ihite-Oha, Uratta, Owerri  
(National President of the  
Peoples Club of Nigeria)

# Progamme

1. Introduction of the MC by Hyacinth Onyekanne
2. Introduction of the Chairman & Supporters
3. Introduction of Members
4. Opening Prayers by Mr. Young Emeka Ahamba
5. Presentation of Kola/ Libation by Dr. Lucius Akuchie
6. Toast by Chief, Sir, F.F.B.C. Nwankwo
7. Welcome Address by Iheanyi O. Aguocha,  
*Onumonu I of Ogwa, Chairman Houston-USA Branch*
8. An Address by the National President
9. The Induction Exercise
10. Presentation of Branch Charter and Certificates
11. Refreshment
12. Cultural extrvaganza
13. Vote of Thanks
14. Closing Remarks
15. DANCE ! DANCE !! DANCE!!!

\*\*\*\*\* HAPPY 1ST ANNIVERSARY \*\*\*\*\*

## Visiting Members From Nigeria

Prince T. L E. Ike- Umezuoke

*"Onyima of Amaichie"*

Founder, Trustee, Patron

\*\*

Chief, Sir, F.F.B.C. Nwankwo,KSj, JP.

*"Osuofia I of Nawfia"*

Father, Trustee, Patron

\*\*

Chief Eddie Igwa

*"Ogene of Aguleri"*

National Secretary

\*\*

Chief I. O. Nwaodu

*"Chinyereugo I of Amakohia"*

Chairman, Owerri branch

\*\*

Chief E. Orji

Secretary, Port Harcourt branch

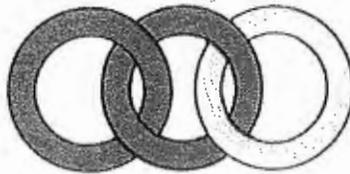
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000034

**1st Anniversary Celebration**

**May 25, 1991**

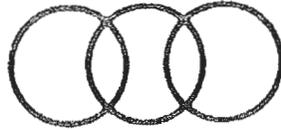
**People's club of Nigeria**



**Motto: UNITY & LOVE & SERVICE**

**Houston-U.S.A.Branch**

*Answer no 14*



8 1/2" x 7"

UNITY LOVE AND SERVICE  
**PEOPLES CLUB OF NIGERIA  
U.S.A. BRANCH  
HOUSTON**

**Establishment  
and  
First Induction Ceremony**

Saturday 26th May, 1990

Venue: Imperial Ballroom East  
Hyatt Regency Downtown  
Houston

Phone: (713) 654-1234  
Time: 1:00 p.m. to 5:00 p.m.

*Answer no 14*

600036



## **Program of Events**

**Introduction of M.C. by Mr. Maxwell Uzoegwu**  
**Introduction of Chairman and Supporters by M.C.**  
**Introduction of Members**  
**Introduction of Inductees**  
**Opening Prayer by Mr. Young Ahamba**  
**Breaking of Kolanut / Libation by Chief Sir F.F.B.C. Nwankwo**  
**Welcome Address by the Chairman of People's Club U.S.A. Branch**  
**Establishment / Inauguration Address by the Father, Patron and Trustee of Peoples Club of Nigeria, Chief, Sir F.F.B.C. Nwankwo**  
**Cultural Extravaganza**  
**Induction Exercise**  
**Advice to Members by the Vice Chairman Mr. Max Ozuzu Uzoegwu**  
**Light Refreshments and Speeches**  
**Closing Remarks**

**Music by High Energy, Felix Osquared**

*Answer 10/14*

## Trademark/Service Mark Application, Principal Register

### TEAS Plus Application

Serial Number: 86116372

Filing Date: 11/12/2013

*NOTE: Data fields with the \* are mandatory under TEAS Plus. The wording "(if applicable)" appears where the field is only mandatory under the facts of the particular application.*

The table below presents the data as entered.

Input Field	Entered
TEAS Plus	YES
<b>MARK INFORMATION</b>	
*MARK	<u>\\TICRS\EXPORT16\IMAGEOUT 16\861\163\86116372\xml\FTK0002.JPG</u>
*SPECIAL FORM	YES
USPTO-GENERATED IMAGE	NO
LITERAL ELEMENT	PEOPLES CLUB OF NIGERIA INTERNATIONAL
*COLOR MARK	YES
*COLOR(S) CLAIMED (If applicable)	The color(s) black, blue, red, yellow is/are claimed as a feature of the mark.
*DESCRIPTION OF THE MARK (and Color Location, if applicable)	The mark consists of the black letters PEOPLES CLUB OF NIGERIA INTERNATIONAL above a blue circle bordered in black linked to a red circle bordered in black linked to a yellow circle bordered in black.
PIXEL COUNT ACCEPTABLE	YES
PIXEL COUNT	944 x 295
REGISTER	Principal
<b>APPLICANT INFORMATION</b>	
*OWNER OF MARK	Peoples Club of Nigeria International
*STREET	16 Wright St.

*CITY	Edison
*STATE (Required for U.S. applicants)	New Jersey
*COUNTRY	United States
*ZIP/POSTAL CODE (Required for U.S. applicants only)	08820
<b>LEGAL ENTITY INFORMATION</b>	
*TYPE	association
* STATE/COUNTRY WHERE LEGALLY ORGANIZED	Nigeria
<b>GOODS AND/OR SERVICES AND BASIS INFORMATION</b>	
*INTERNATIONAL CLASS	041
*IDENTIFICATION	Social club services, namely, arranging, organizing, and hosting social events, get-togethers, and parties for club members
*FILING BASIS	SECTION 1(a)
FIRST USE ANYWHERE DATE	At least as early as 00/00/1994
FIRST USE IN COMMERCE DATE	At least as early as 00/00/1994
SPECIMEN FILE NAME(S)	
ORIGINAL PDF FILE	<u>SPE0-9767147154-131702076 . filename-1.pdf</u>
CONVERTED PDF FILE(S) (1 page)	<u>\\TICRS\EXPORT16\IMAGEOUT16\861\163\86116372\xml1\FTK0003.JPG</u>
SPECIMEN DESCRIPTION	letterhead
<b>ADDITIONAL STATEMENTS SECTION</b>	
*TRANSLATION (if applicable)	
*TRANSLITERATION (if applicable)	
*CLAIMED PRIOR REGISTRATION (if applicable)	
*CONSENT (NAME/LIKENESS)	

000040

(if applicable)	
<b>*CONCURRENT USE CLAIM (if applicable)</b>	
<b>DISCLAIMER</b>	No claim is made to the exclusive right to use "Nigeria" apart from the mark as shown.
<b>ATTORNEY INFORMATION</b>	
<b>NAME</b>	Matthew H. Swyers, Esq.
<b>FIRM NAME</b>	The Trademark Company
<b>STREET</b>	344 Maple Ave. West, Suite 151
<b>CITY</b>	Vienna
<b>STATE</b>	Virginia
<b>COUNTRY</b>	United States
<b>ZIP/POSTAL CODE</b>	22180
<b>PHONE</b>	1-800-906-8626
<b>FAX</b>	1-877-351-5480
<b>EMAIL ADDRESS</b>	info@thetrademarkcompany.com
<b>AUTHORIZED TO COMMUNICATE VIA EMAIL</b>	Yes
<b>CORRESPONDENCE INFORMATION</b>	
<b>*NAME</b>	Matthew H. Swyers, Esq.
<b>FIRM NAME</b>	The Trademark Company
<b>*STREET</b>	344 Maple Ave. West, Suite 151
<b>*CITY</b>	Vienna
<b>*STATE (Required for U.S. applicants)</b>	Virginia
<b>*COUNTRY</b>	United States
<b>*ZIP/POSTAL CODE</b>	22180
<b>PHONE</b>	1-800-906-8626
<b>FAX</b>	1-877-351-5480
<b>*EMAIL ADDRESS</b>	info@thetrademarkcompany.com
<b>*AUTHORIZED TO COMMUNICATE VIA</b>	Yes

000041

EMAIL	
<b>FEE INFORMATION</b>	
NUMBER OF CLASSES	1
FEE PER CLASS	275
*TOTAL FEE PAID	275
<b>SIGNATURE INFORMATION</b>	
* SIGNATURE	/Matthew H. Swyers/
* SIGNATORY'S NAME	Matthew H. Swyers
* SIGNATORY'S POSITION	Attorney of Record
SIGNATORY'S PHONE NUMBER	1-800-906-8626
* DATE SIGNED	11/12/2013

## Trademark/Service Mark Application, Principal Register

### TEAS Plus Application

Serial Number: 86116372

Filing Date: 11/12/2013

#### To the Commissioner for Trademarks:

**MARK:** PEOPLES CLUB OF NIGERIA INTERNATIONAL (stylized and/or with design, see mark)

The literal element of the mark consists of PEOPLES CLUB OF NIGERIA INTERNATIONAL. The color(s) black, blue, red, yellow is/are claimed as a feature of the mark. The mark consists of the black letters PEOPLES CLUB OF NIGERIA INTERNATIONAL above a blue circle bordered in black linked to a red circle bordered in black linked to a yellow circle bordered in black.

The applicant, Peoples Club of Nigeria International, a association legally organized under the laws of Nigeria, having an address of

16 Wright St.  
Edison, New Jersey 08820  
United States

requests registration of the trademark/service mark identified above in the United States Patent and Trademark Office on the Principal Register established by the Act of July 5, 1946 (15 U.S.C. Section 1051 et seq.), as amended, for the following:

**For specific filing basis information for each item, you must view the display within the Input Table.**

International Class 041: Social club services, namely, arranging, organizing, and hosting social events, get-togethers, and parties for club members

In International Class 041, the mark was first used by the applicant or the applicant's related company or licensee predecessor in interest at least as early as 00/00/1994, and first used in commerce at least as early as 00/00/1994, and is now in use in such commerce. The applicant is submitting one(or more) specimen(s) showing the mark as used in commerce on or in connection with any item in the class of listed goods and/or services, consisting of a(n) letterhead.

**Original PDF file:**

SPE0-9767147154-131702076 . filename-1.pdf

**Converted PDF file(s) (1 page)**

Specimen File1

000043

No claim is made to the exclusive right to use "Nigeria" apart from the mark as shown.

The applicant's current Attorney Information:

Matthew H. Swyers, Esq. of The Trademark Company  
344 Maple Ave. West, Suite 151  
Vienna, Virginia 22180  
United States

The applicant's current Correspondence Information:

Matthew H. Swyers, Esq.  
The Trademark Company  
344 Maple Ave. West, Suite 151  
Vienna, Virginia 22180  
1-800-906-8626(phone)  
1-877-351-5480(fax)  
info@thetrademarkcompany.com (authorized)

A fee payment in the amount of \$275 has been submitted with the application, representing payment for 1 class(es).

**Declaration**

The undersigned, being hereby warned that willful false statements and the like so made are punishable by fine or imprisonment, or both, under 18 U.S.C. Section 1001, and that such willful false statements, and the like, may jeopardize the validity of the application or any resulting registration, declares that he/she is properly authorized to execute this application on behalf of the applicant; he/she believes the applicant to be the owner of the trademark/service mark sought to be registered, or, if the application is being filed under 15 U.S.C. Section 1051(b), he/she believes applicant to be entitled to use such mark in commerce; to the best of his/her knowledge and belief no other person, firm, corporation, or association has the right to use the mark in commerce, either in the identical form thereof or in such near resemblance thereto as to be likely, when used on or in connection with the goods/services of such other person, to cause confusion, or to cause mistake, or to deceive; and that all statements made of his/her own knowledge are true; and that all statements made on information and belief are believed to be true.

Signature: /Matthew H. Swyers/ Date Signed: 11/12/2013  
Signatory's Name: Matthew H. Swyers  
Signatory's Position: Attorney of Record

RAM Sale Number: 86116372  
RAM Accounting Date: 11/12/2013

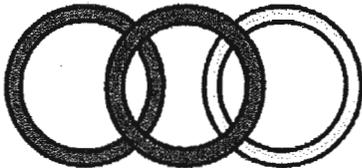
Serial Number: 86116372  
Internet Transmission Date: Tue Nov 12 13:30:59 EST 2013

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TEAS Stamp: USPTO/FTK-97.67.147.154-2013111213305958  
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000045

**PEOPLES CLUB OF NIGERIA INTERNATIONAL**



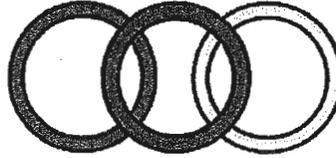
# PEOPLES CLUB OF NIGERIA INTERNATIONAL

REGISTERED IN NIGERIA  
REGISTERED IN UNITED STATES  
REGISTERED IN UNITED KINGDOM  
REGISTERED IN CANADA

## USA Address

16 Wright Street  
Edison, NJ 08820

Chief F.A. Onwuachu  
Chairman, Management Committee  
Ichie P.D.C. Okechukwu  
General Secretary, Management Committee



## Headquarters

Onitsha/Owerri Road  
P.O. Box 5421  
Onitsha, Anambra State  
NIGERIA

## USA Branches

Houston  
Washington, DC  
Miami  
Princeton  
Galveston  
Dallas/Fort Worth  
Boston  
Philadelphia  
Atlanta  
New York  
Cherry Hill  
San Francisco  
Princeton Junction  
Chicago  
Arlington  
New Haven  
Los Angeles  
San Antonio  
Virginia Beach  
Austin Texas

## Canada

Toronto Branch

## United Kingdom

London Branch

*Info @ The Trademark Company.com  
Attn: NEW MARK DESIGN*

Governing Council: HRH Igwe P.C. Ezenwa, Chairman

000047



**The Trademark Company**

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Vienna, VA 22180  
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TheTrademarkCompany.com

Matthew H. Swyers, Esq.<sup>2</sup>  
Writer's Direct (800) 906-8626 x100  
mswyers@TheTrademarkCompany.com

**FRE 408 APPLIES**

February 23, 2015

VIA CERTIFIED MAIL

PCNI Chicago Branch  
Attn: Dr. Michael Ukeje Anayo  
7717 Keeler Avenue  
Skokie, IL 60076-3603

**RE: Peoples Club of Nigeria Intl. v. PCNI Chicago Branch**  
Use of Mark: PEOPLES CLUB OF NIGERIA INTERNATIONAL and Design  
TMCO Matter No.: 22202

Dr. Anayo:

Please be advised that we represent Peoples Club of Nigeria International in regard to the protection of their federally protected intellectual property. In this regard, we are writing regarding PCNI Chicago Branches' use of the

PEOPLES CLUB OF NIGERIA INTERNATIONAL

mark PEOPLES CLUB OF NIGERIA INTERNATIONAL and Design:



Our client has been continuously using the mark PEOPLES CLUB OF NIGERIA INTERNATIONAL and

PEOPLES CLUB OF NIGERIA INTERNATIONAL

Design:  in connection to "Social club services, namely, arranging, organizing, and hosting social events, get-togethers, and parties for club members" since as early as 1994. Because of the excellent quality of the services provided under our client's mark in conjunction with the substantial resources dedicated to promoting the same our client's mark has become distinctive and synonymous with its mark and now embodies a very substantial amount of valuable business goodwill. More importantly the mark is protected by U.S. Reg. No. 4,591,874.

It has recently come to our client's attention that your organization, PCNI Chicago Branch, is using the mark

PEOPLES CLUB OF NIGERIA INTERNATIONAL

PEOPLES CLUB OF NIGERIA INTERNATIONAL and Design:  in connection with social club services, namely, arranging, organizing, and hosting social events, get-togethers, and parties for club members. Your

<sup>2</sup>Admitted to practice in Virginia and the District of Columbia. Practice limited to federal trademark and copyright law.

RR0043

organizations use of the mark PEOPLES CLUB OF NIGERIA INTERNATIONAL and Design:  is confusingly similar, if not identical, to our client's registered mark as listed above and dilutes the distinctiveness of that mark.

Your club may be liable for compensatory damages measured by both our client's losses and your organizations' ill-gotten gains which are subject to trebling as well as attorneys' fees and court costs if our client is forced to bring a civil action against PCNI Chicago Branch to enforce its rights.

Thus, this is our formal demand that PCNI Chicago Branch:

- Cease any use of the mark PEOPLES CLUB OF NIGERIA INTERNATIONAL and Design  or "PEOPLES CLUB OF NIGERIA INTERNATIONAL" within 14 days;
- Remove all instances of the infringing mark from pages posted online within 14 days;
- Cease all use of the infringing mark on all club materials within 14 days;
- Destroy all club materials bearing the infringing mark within 14 days;
- Provide an accounting of any and/or all profits received as a result of the unauthorized use of our client's mark within 14 days; and
- Provide an accounting of any and/or all items left bearing the infringing mark within 14 days.

We ask that you confirm, in writing, that your organization will comply with our client's demands no later than March 9, 2015. Failure to do so or to otherwise contact our office concerning this matter will be regarded as non-compliance with our client's demands and will be responded to accordingly.

Thank you for your time and attention to this matter. Lastly, nothing herein shall be construed as an admission against the interests of our client all of whose rights are hereby expressly reserved.

Yours very truly,

/Matthew H. Swyers/

cc: AM



000049

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

-----x

PEOPLES CLUB OF NIGERIA  
INTERNATIONAL (PCNI),  
PRINCETON JUNCTION BRANCH,  
PCNI CHICAGO BRANCH, PCNI  
MIAMI BRANCH,

Petitioners,

-vs-

PEOPLES CLUB OF NIGERIA  
INTERNATIONAL, INC., a  
New Jersey Corporation,

Registrant.

-----x

June 10, 2015

11:06 a.m.

DEPOSITION OF DR. AMBROSE MGBAKO, on behalf of  
registrant herein, taken pursuant to Notice, and held  
at the offices of Ramada Plaza, Newark Liberty  
International Airport Hotel, 160A Frontage Road,  
Newark, New Jersey, before Mary T. Slavik, RPR, a  
Court Reporter and Notary Public.

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Page 2

1 APPEARANCES:  
 2  
 3 STARK & STARK, P.C.  
 Attorneys for Petitioners  
 4 PEOPLES'S CLUB OF NIGERIA  
 INTERNATIONAL (PCNI), INC.  
 993 Lenox Drive, Building 2, 3rd Floor  
 5 Lawrenceville, New Jersey 08648  
 (609) 895-7346  
 6 By: CRAIG S. HILLIARD, ESQ.  
 chilliard@stark-stark.com  
 7  
 8 THE TRADEMARK COMPANY  
 Attorneys for Registrant  
 9 PEOPLE'S CLUB OF NIGERIA  
 INTERNATIONAL, INC.  
 344 Maple Avenue West, Suite 151  
 10 Vienna, Virginia 22180  
 By: MATTHEW H. SWYERS, ESQ.  
 (Appeared Telephonically)  
 11 mswyers@thetrademarkcompany.com  
 12  
 13 ALSO PRESENT: Roxanna Yau, Court Reporter Student.  
 14 Gordian Ndubizu, Petitioner.  
 15  
 16  
 17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25

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1 DR. AMBROSE MGBAKO,  
 2 having first been duly sworn by the Notary Public (Mary  
 3 T. Slavik), and stating his address as 16 Wright  
 4 Street, Edison, New Jersey 08820, was examined and  
 5 testified as follows:  
 6  
 7 DIRECT EXAMINATION  
 8  
 9 BY MR. HILLIARD:  
 10 Q. Dr. Mgbako, did I just pronounce your  
 name correctly?  
 11 A. That's correct, yes.  
 12 Q. Good morning.  
 13 A. Good morning.  
 14 Q. My name is a Craig Hilliard, and I'm  
 15 with the law firm Stark & Stark in New Jersey  
 16 that represents three petitioners -- we call  
 17 them petitioners in a legal proceeding --  
 18 that's before a group called the Trademark  
 19 Trial and Appeal Board right now. It's an  
 20 action that these petitioners filed.  
 21 I represent them, the People's Club of  
 22 Nigeria International, Princeton Junction  
 23 branch, who we'll call People's Club of Nigeria  
 24 International Inc., PCNI, for short, if that's  
 25 okay with you -- and there's a Miami branch and

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 10  
 11 P-1 Trademark Application (9 pages) 63  
 12 P-2 Response to Office Action (6 pages) 73  
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 14  
 15 (Exhibits were retained by the Court  
 16 Reporter to be attached to the transcript.)  
 17  
 18 INFORMATION REQUESTED: 91:15  
 19  
 20  
 21  
 22  
 23  
 24  
 25

Page 5

1 a Chicago branch; and they have all grouped  
 2 together to file this legal proceeding, you  
 3 know, involving a trademark registration you  
 4 were involved in filing.  
 5 Do you understand that?  
 6 A. That's correct.  
 7 Q. Okay. We're here today to take your  
 8 deposition testimony in connection with that  
 9 legal proceeding.  
 10 Do you understand that?  
 11 A. Yes.  
 12 Q. And do you understand that you've just  
 13 given an oath to testify accurately and  
 14 truthfully today?  
 15 A. I do.  
 16 Q. Okay. Have you ever gone through this  
 17 process before of testifying in a deposition?  
 18 A. Yes.  
 19 Q. You have?  
 20 How many times have you done this?  
 21 A. I can't give you an exact amount of  
 22 times.  
 23 Q. Can you give me an estimate?  
 24 A. I cannot give you.  
 25 Q. Were any of those occasions in which

Page 6

1 you gave deposition testimony in connection  
 2 with anything involving PCNI?  
 3 A. No.  
 4 Q. They were all other matters perhaps  
 5 related to your business or personal life?  
 6 A. That's correct.  
 7 Q. Okay. I'm going to give you just a few  
 8 ground rules so that you're comfortable with  
 9 the process today.  
 10 Number one, even though we're in the  
 11 informal setting of a conference room in a  
 12 hotel, you should treat this as seriously as if  
 13 you were in a courtroom testifying in front of  
 14 the judge.  
 15 Do you understand that?  
 16 A. Yes.  
 17 Q. If you don't understand a question that  
 18 I've asked, please tell me and ask me to  
 19 rephrase it. I'll be happy to do that.  
 20 Sometimes I ask confusing questions; so if you  
 21 don't understand what I'm asking, tell me that  
 22 and I'll try to rephrase it to the best of my  
 23 ability, but it's most important that you  
 24 understand the question I'm asking; so that  
 25 you're able to give a truthful, accurate answer

Page 7

1 to the extent that you can.  
 2 Someone reading this transcript -- and  
 3 there will be a transcript prepared with the  
 4 questions and answers; someone reading this  
 5 transcript at a later date, such as, members of  
 6 a board, the TTAB, the Trademark Trial and  
 7 Appeal Board, who will be deciding this case,  
 8 will be reading that transcript, and we'll  
 9 assume that if you answer the question, that  
 10 you understood it and gave an accurate answer.  
 11 Is that acceptable?  
 12 A. Yes.  
 13 Q. I don't want you to guess or speculate  
 14 at anything. If you know the answer, tell me.  
 15 If you don't know the answer, tell me that. If  
 16 you don't recall the answer, tell me that as  
 17 well. But guesses and speculation do none of  
 18 the parties any good here today; is that  
 19 acceptable?  
 20 A. I understand.  
 21 Q. Okay. Can you briefly describe for me  
 22 your educational background, sir?  
 23 A. I'm a physician.  
 24 Q. And you hold a license to practice law  
 25 in New Jersey?

Page 8

1 A. That's correct.  
 2 Q. And when did you receive that license?  
 3 A. 1976.  
 4 Q. What type of medical practice are you  
 5 involved in today?  
 6 A. I'm a psychiatrist.  
 7 Q. And have you been a practicing  
 8 psychiatrist in New Jersey since 1976?  
 9 A. Correct.  
 10 Q. From what institution did you receive  
 11 your medical degree?  
 12 A. University of Ibadan of Nigeria.  
 13 THE COURT REPORTER: The University of  
 14 what?  
 15 THE WITNESS: Of Ibadan, I-B-A-D-A-N.  
 16 Ibadan, Nigeria.  
 17 BY MR. HILLIARD:  
 18 Q. When did you receive that degree?  
 19 A. June 1972.  
 20 Q. You were born in Nigeria; correct?  
 21 A. Correct.  
 22 Q. And when did you move permanently to  
 23 the United States?  
 24 A. 1975.  
 25 Q. Are you a U.S. citizen?

Page 9

1 A. I am.  
 2 Q. When did you become a U.S. citizen?  
 3 A. I can't give you an exact year, but  
 4 somewhere around 1980s. I can't really give  
 5 you an exact date.  
 6 Q. Somewhere in the 1980s you became a  
 7 U.S. citizen?  
 8 A. Naturalized.  
 9 Q. Naturalized citizen?  
 10 A. Yes.  
 11 Q. Are you a dual citizen --  
 12 A. Yes.  
 13 Q. -- of Nigeria as well?  
 14 A. Yes.  
 15 Q. Okay. And are you a resident of New  
 16 Jersey?  
 17 A. Yes.  
 18 Q. How long have you been a resident of  
 19 New Jersey?  
 20 A. Since 1975.  
 21 Q. What is your current home address?  
 22 A. 16 Wright Street, W-R-I-G-H-T, Edison,  
 23 New Jersey 08820.  
 24 Q. How long have you resided at 16 Wright  
 25 Street in Edison?

Page 10

1 A. Since 1998.  
 2 Q. And that is a private residence;  
 3 correct?  
 4 A. Yes.  
 5 Q. Do you operate any business out of your  
 6 residence?  
 7 A. No, no. I have a private office there,  
 8 but I don't see patients there.  
 9 Q. A private medical office?  
 10 A. Yes, but I don't see patients.  
 11 Q. Okay. Did you ever?  
 12 A. No.  
 13 Q. Other than your medical practice, do  
 14 you operate any business in any way out of the  
 15 residence at 16 Wright Street in Edison?  
 16 A. No.  
 17 Q. Have you ever listed your residence  
 18 with anyone as a place of business for any  
 19 organization?  
 20 A. No, I not -- no. Let me -- let me --  
 21 let me qualify that. My 16 Wright Street is  
 22 the address for People's Club of Nigeria  
 23 International, and it's also the address of  
 24 several associations that I belong to.  
 25 Q. Can you name those other organizations?

Page 11

1 A. Anambra-Enugu States Association.  
 2 THE COURT REPORTER: Wait, say that one  
 3 --  
 4 THE WITNESS: Anambra, A-N-A-M-B-R-A,  
 5 E-N-U-G-U, States Association.  
 6 THE COURT REPORTER: States  
 7 Association?  
 8 THE WITNESS: Yes.  
 9 BY MR. HILLIARD:  
 10 Q. What is it?  
 11 A. States. It's a social organization.  
 12 Q. What type of social organization is  
 13 this?  
 14 Do you know?  
 15 A. Membership. Social. Nigerians from  
 16 Anambra State.  
 17 Q. Is this associated in any way with  
 18 PCNI?  
 19 A. No.  
 20 Q. Is that an entity? Is it an entity?  
 21 Is it an actual corporate entity?  
 22 Anambra?  
 23 A. It's a social organization.  
 24 Q. Are you --  
 25 A. I'm the -- I'm the agent. I'm the

Page 12

1 original one. I started it, so they use the  
 2 official address. The official address comes  
 3 to me from the states.  
 4 Q. Are there any others you mentioned that  
 5 you are --  
 6 A. Not that I can recall.  
 7 Q. Let me -- I don't mean to be rude, sir,  
 8 but one of the instructions I just forgot to  
 9 give you was to allow me to finish my entire  
 10 question before you start your answer.  
 11 It's very normal to get into  
 12 conversational mode, but it makes it difficult  
 13 for our court reporter to take everything down;  
 14 so it's a different process. I know, but let  
 15 me finish before you actually start your  
 16 answer.  
 17 You just mentioned -- before, you  
 18 mentioned Anambra, that your 16 Wright Street  
 19 address is also a registered address for  
 20 People's Club of International -- Nigeria  
 21 International; is that correct?  
 22 A. Yes.  
 23 Q. Can you be more specific about the  
 24 entity itself that you just mentioned?  
 25 Is it --

Page 13

1 A. What entity?  
 2 Q. People's Club of Nigeria International.  
 3 Does your residential address serve as  
 4 the business location for any entity that's  
 5 associated with PCNI?  
 6 A. That's the registered address of PCNI.  
 7 Q. Of PCNI? What PCNI? In other words --  
 8  
 9 A. The subsidiary. The People's Club of  
 10 Nigeria International.  
 11 Q. Which subsidiary?  
 12 A. The subsidiary of People's Club of  
 13 Nigeria International.  
 14 Q. Is there only one subsidiary?  
 15 A. There's only one subsidiary. That's  
 16 the only one.  
 17 Q. Okay. And is there a -- is that entity  
 18 called People's Club of Nigeria International,  
 19 Inc., I-N-C period?  
 20 A. Yes.  
 21 Q. Okay. And so your residential address  
 22 is the registered office of People's Club of  
 23 Nigeria International, Inc.?  
 24 A. It's a registered address of People's  
 25 Club of Nigeria International, Inc. If I

Page 14

1 remember, there's also People's Club of Nigeria  
 2 Princeton. I'm the agent, and that's the  
 3 registered agent, that address.  
 4 Q. For PCNI Princeton?  
 5 A. Princeton, yes.  
 6 Q. Is that what's called a branch of PCNI?  
 7 A. That's a branch of PCNI, yes.  
 8 Q. Is that PCNI Princeton -- is that group  
 9 also separately incorporated?  
 10 Is it a separate company?  
 11 A. Yes.  
 12 Q. Is it -- does it have an actual name,  
 13 other than -- you call it PCNI Princeton, but  
 14 is it PCNI Princeton Corp.?  
 15 Is it PCNI Princeton, Inc.?  
 16 Do you understand what I'm asking?  
 17 A. What I know is People's Club of Nigeria  
 18 International, Princeton branch. That's the  
 19 name.  
 20 Q. Got it. Were you involved in any way  
 21 in forming People's Club of Nigeria  
 22 International, Inc., the company you just  
 23 referred to as the subsidiary?  
 24 A. Yes.  
 25 Q. What was your role in forming that

Page 15

1 entity?  
 2 A. I was the agent told to form that  
 3 entity by the leadership of People's Club of  
 4 Nigeria International.  
 5 Q. Okay. When you say you were told by the  
 6 leadership to form it, can you be more specific  
 7 about who the leadership was that told you to  
 8 form PCNI, Inc.?  
 9 A. There was a meeting in 2010, and during  
 10 that meeting, the decision was made to form a  
 11 subsidiary branch.  
 12 Q. Where was this meeting held?  
 13 A. I believe it was in Houston. I'm not  
 14 sure of the town. It was either Houston or  
 15 somewhere in South New Jersey.  
 16 There was a meeting then of the Central  
 17 Executive Committee that was attended by  
 18 trustees of the club -- some of them.  
 19 Q. By "club," who do you mean? PCNI?  
 20 A. Yes, PCNI.  
 21 Q. Of Nigeria?  
 22 A. Nigeria. Yes.  
 23 Q. Okay. Thank you.  
 24 A. And the management, the leader -- the  
 25 leader of the management committee at the time.

Page 16

1 That's where that decision was made.  
 2 Q. You were present for that meeting?  
 3 A. Oh, yes.  
 4 Q. At the time of that meeting in 2010  
 5 with the Executive Committee, what position, if  
 6 any, did you hold with PCNI Nigeria?  
 7 What role or title, if any, did you  
 8 have with PCNI Nigeria?  
 9 A. Member.  
 10 Q. Other than a member, did you hold any  
 11 officer title?  
 12 A. I believe I was a patron there. I'm  
 13 not sure, but I was a patron -- going to be a  
 14 patron.  
 15 Q. What does that mean?  
 16 For me -- for someone like me, who  
 17 doesn't understand the structure, can you  
 18 describe for me what is meant to be a patron?  
 19 A. A patron is somebody who is appointed  
 20 by the club -- by the leadership of the club to  
 21 hold an elected position -- not elected --  
 22 appointed, is an honorary position.  
 23 Q. Honorary position?  
 24 A. Yes.  
 25 Q. Did you have any decision-making

Page 17

1 authority for PCNI Nigeria at the time this  
 2 Central Executive Committee meeting was held in  
 3 2010 in Houston?  
 4 A. No.  
 5 Q. Were you invited to attend the meeting?  
 6 A. I attended the meeting because I'm a  
 7 member of PCNI.  
 8 Q. Okay. Does that mean that other people  
 9 who were simply members had the right to attend  
 10 that meeting?  
 11 A. That's correct.  
 12 Q. How many people were there at that  
 13 meeting?  
 14 A. I don't know.  
 15 Q. Who made up the membership of the  
 16 Executive Committee for that meeting that was  
 17 held in 2010 in Houston?  
 18 A. The leader was there.  
 19 Q. Who was the leader?  
 20 A. Onwuachu. Chief Onwuachu.  
 21 THE COURT REPORTER: I'm sorry.  
 22 THE WITNESS: Chief Onwuachu,  
 23 O-N-W-U-A-C-H-U. He's the leader of the  
 24 management committee.  
 25 Q. Onwuachu. Onwuachu? Did I pronounce

1 it right?  
 2 A. Yes.  
 3 Q. Okay. I apologize for my bad  
 4 mispronunciations in advance.  
 5 A. And I cannot give you the names of  
 6 everybody there, because I didn't take any  
 7 notes. Usually, those meetings are attended by  
 8 people from Nigeria. Of course, the leader, he  
 9 was there. I cannot give you the names of the  
 10 people who were there.  
 11 Q. Okay. But you only remember Chief  
 12 Onwuachu?  
 13 A. Yes. Yes, he was there.  
 14 Q. Now, am I correct that he was the top  
 15 leader of PCNI Nigeria at that time?  
 16 A. He was administrative leader, not the  
 17 top leader.  
 18 Q. He was the administrative leader. What  
 19 does that mean?  
 20 A. The leader that runs the day-to-day  
 21 affairs of the club.  
 22 Q. At that time in 2010?  
 23 A. Yes.  
 24 Q. Still today?  
 25 A. No.

1 Q. Okay. Who was the administrative  
 2 leader today?  
 3 A. Ilonze. He's the President of PCNI.  
 4 THE COURT REPORTER: What was it?  
 5 THE WITNESS: Ilonze. I-L-O-N-Z-E.  
 6 Dr. Ilonze, the people's leader.  
 7 BY MR. HILLIARD:  
 8 Q. You just described Dr. -- Chief  
 9 Onwuachu as the administrative leader.  
 10 Who was the leader of PCNI Nigeria,  
 11 non-administrative -- the head of the  
 12 organization; or is there a CEO, in other  
 13 words?  
 14 A. No. There's a group known as Governing  
 15 Council.  
 16 Q. Okay. And that Governing Council, am I  
 17 correct has --  
 18 A. Has a --  
 19 Q. -- executive decision-making authority  
 20 for the organization?  
 21 A. And the people would refer to those who  
 22 make the final decisions.  
 23 Q. And set policies for the organization?  
 24 A. Yes, set policies.  
 25 Q. Were any of the Governing Council or

1 any members of the Governing Council present at  
 2 the time of the Central Executive Committee  
 3 meeting in 2010?  
 4 A. Yes.  
 5 Q. Those folks were there?  
 6 A. Some of them, yes.  
 7 Q. Okay. Now, before this meeting was  
 8 held in Houston, or during which the decision,  
 9 as you testified was made to form a subsidiary  
 10 in the United States, did PCNI Nigeria have any  
 11 other organizational structure in the United  
 12 States?  
 13 A. Yes.  
 14 Q. It did. What was that organizational  
 15 structure?  
 16 A. PCNI has branches of the club in the  
 17 United States.  
 18 Q. Okay. And did for some time prior to  
 19 this meeting in 2010?  
 20 A. Yes.  
 21 Q. Okay. Can you name for me any of the  
 22 branches which existed prior to this meeting in  
 23 2010?  
 24 A. I can try. Houston.  
 25 Q. Was that the first --

1 A. Yes.  
 2 Q. -- branch?  
 3 A. Yes.  
 4 Q. Okay. So the Houston branch, when it  
 5 was formed, was the first presence of -- I'll  
 6 call it a social club of the PCNI social club  
 7 in the United States when that was formed?  
 8 A. That's correct.  
 9 Q. Okay. Who else, other than Houston?  
 10 A. Washington, Miami, Princeton. I can't  
 11 really remember all the clubs there.  
 12 Q. There was several other branches, other  
 13 than the ones that you just named?  
 14 A. Yes. There were many of them.  
 15 Q. And was Princeton Junction a particular  
 16 branch that existed before this meeting in 2010  
 17 in Houston?  
 18 A. Yes.  
 19 Q. Okay. Had it existed for several years  
 20 before you had this Houston meeting during  
 21 which you -- the decision was made to form  
 22 PCNI, Inc.?  
 23 A. Yes.  
 24 Q. Okay. Do you have any knowledge about  
 25 how the different branches are formed -- have

Page 22

1 been formed in the past and maybe formed today?  
 2 A. I'll tell you what I know.  
 3 Q. What do you know about the -- and  
 4 really what I'm asking you is how does one --  
 5 how does one go about forming a branch if  
 6 they're interested in forming a branch?  
 7 A. If they're forming a branch, you have  
 8 to do it through a protocol. You need a  
 9 protocol formation. You will apply for a  
 10 charter, because the license from --  
 11 Q. To whom do you apply?  
 12 A. The head in Nigeria.  
 13 Q. In Nigeria?  
 14 A. Yes. If they approve your charter,  
 15 you're licensed, that gives you the right to  
 16 form a branch of People's Club of Nigeria  
 17 International. Okay.  
 18 And the day the club is chartered,  
 19 people will come from Nigeria, their leader and  
 20 ambassador of the Executive Committee and the  
 21 Board of Trustees. The represented group will  
 22 be there. There's a ceremony, and the branch  
 23 will be chartered. And the branch -- that's  
 24 the way it is formed.  
 25 Q. Is there a particular document, for

Page 23

1 lack of a better word, a charter that is  
 2 provided to the branch which recognizes it as a  
 3 branch?  
 4 A. Yes.  
 5 Q. Okay. Were you personally involved in  
 6 organizing any branch of PCNI of Nigeria in the  
 7 United States?  
 8 A. No.  
 9 Q. Am I correct, that you have been  
 10 associated with a particular branch of --  
 11 during your time as a member?  
 12 A. I've been a member of one branch.  
 13 Q. Is that the Princeton branch?  
 14 A. The Princeton branch.  
 15 Q. But you did not participate in forming  
 16 that branch or in seeking the charter for that  
 17 branch; is that correct?  
 18 A. No.  
 19 Q. You joined it at some time after it had  
 20 been formed?  
 21 A. I joined it in 1998, yes.  
 22 Q. Okay. And what -- what, if any, role  
 23 do you have today in the Princeton branch?  
 24 A. I'm a member.  
 25 Q. Are you an officer?

Page 24

1 A. No.  
 2 Q. Are there officers of the branch?  
 3 A. Of Princeton branch?  
 4 Q. Yes. Have you ever been an officer of  
 5 the Princeton branch?  
 6 A. I was an interim. There was -- the  
 7 Princeton branch went through a crisis period.  
 8 Some people left. Some people stayed.  
 9 And I -- I was the leader of the group  
 10 that restructured that branch and got it -- got  
 11 it going. I was -- I was never elected. I was  
 12 appointed to do that, and I did it.  
 13 Q. Who appointed you to do that?  
 14 A. After it was integrated, the members --  
 15 they came together and said, "You lead the  
 16 group."  
 17 Q. Strictly the Princeton branch?  
 18 A. Yes.  
 19 Q. When did that happen?  
 20 A. I can't give you the exact date. That  
 21 was around 2002 or so -- 2002; 2002 to 2003,  
 22 but I cannot -- I have to go back and look at  
 23 the date.  
 24 Q. Okay. So as of today, you are a member  
 25 of the Princeton branch; correct?

Page 25

1 A. Yes.  
 2 Q. Does the Princeton branch have a  
 3 registered business address?  
 4 A. They have to have a registered business  
 5 address, yes.  
 6 Q. Is it your home?  
 7 A. No.  
 8 Q. It's some other address?  
 9 A. Yes.  
 10 Q. Do you know where that address is?  
 11 A. I don't know.  
 12 Q. Does it have -- does it have a physical  
 13 facility? Does it own a facility?  
 14 A. Does not own a facility, as far as I  
 15 know.  
 16 Q. And did it ever?  
 17 A. No.  
 18 Q. Where are its functions held?  
 19 A. At this hotel.  
 20 Q. Okay.  
 21 THE COURT REPORTER: I'm sorry. Where?  
 22 MR. HILLIARD: At this hotel.  
 23 THE WITNESS: At this hotel. Ramada  
 24 Inn.  
 25

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1 BY MR. HILLIARD:  
 2 Q. They're at Ramada Inn here?  
 3 A. This is where the meetings are held,  
 4 and this is where many of the activities are  
 5 held.  
 6 Q. Okay. Do you know if the Princeton  
 7 branch is a separately formed entity?  
 8 By "entity," I mean, a corporation or a  
 9 limited liability company. Do you know its  
 10 formation structure?  
 11 A. It's a registered nonprofit  
 12 organization.  
 13 Q. They are?  
 14 THE COURT REPORTER: I'm sorry.  
 15 THE WITNESS: They are a registered  
 16 nonprofit organization.  
 17 THE COURT REPORTER: Just keep your  
 18 voice up for me.  
 19 THE WITNESS: Okay.  
 20 THE COURT REPORTER: Thank you.  
 21 BY MR. HILLIARD:  
 22 Q. Thank you. Do you know as a registered  
 23 not-for-profit organization it has a -- it's  
 24 called something like, Inc., Corps, or LLC, if  
 25 you know?

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1 A. I don't know.  
 2 Q. So going back to the meeting you just  
 3 described for me in Houston in 2010, involving  
 4 the executive committee, you attended that  
 5 meeting as a member along with other members;  
 6 correct?  
 7 A. Yes.  
 8 Q. Okay. And was there, if you recall, an  
 9 agenda for that meeting?  
 10 A. I don't know.  
 11 Q. Do you recall seeing anything in  
 12 advance of the meeting that described why the  
 13 meeting was being held?  
 14 A. I don't recall.  
 15 Q. Was this a regular -- I'll call it an  
 16 annual meeting -- was this something that was  
 17 held regularly that you were attending, or was  
 18 this a specialty meeting?  
 19 A. They come when they choose to come.  
 20 The meeting is announced and then people go.  
 21 And that's all. I'm not part of that  
 22 administration; so I know that the meeting is  
 23 held; we go.  
 24 Q. What, if anything, do you recall about  
 25 the discussions at the meeting about the

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1 formation of People's Club of Nigeria  
 2 International, Inc., the subsidiaries?  
 3 A. All I can tell you is what I was told  
 4 to do. I was told to incorporate a subsidiary  
 5 of People's Club of Nigeria in the United  
 6 States. And to go from there and open an  
 7 account, we would use as part of doing  
 8 business. And I was also asked at that time to  
 9 look into forming a 501(c)(3) company; so that  
 10 People's Club of Nigeria International can  
 11 perform some charity functions in the United  
 12 States.  
 13 These were the instructions that were  
 14 given to me, and that's what I did. I  
 15 registered People's Club of Nigeria  
 16 International subsidiary.  
 17 Q. And you did that in 2010?  
 18 A. I did that in August 2010.  
 19 Q. Okay.  
 20 A. I went to a lawyer, explained the  
 21 directions given to me, and the lawyer  
 22 registered the corporation, and looked at the  
 23 constitution, and then --  
 24 Q. I'm sorry. I missed that.  
 25 A. Looked at the constitution.

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1 Q. Who looked at the constitution?  
 2 A. The lawyers.  
 3 Q. What constitution?  
 4 A. The People's Club of Nigeria  
 5 Constitution.  
 6 Q. Okay.  
 7 A. International.  
 8 Q. Who was the lawyer that you hired?  
 9 A. Sebastian.  
 10 Q. That's his last name?  
 11 A. Yeah. That's the first name.  
 12 Q. What was the last name?  
 13 A. It escapes me.  
 14 Q. First name was Sebastian --  
 15 A. Ibezim. Ibezim. I-B-E-Z-I-M.  
 16 THE COURT REPORTER: I-B-E-Z --  
 17 THE WITNESS: I-B-E-Z-I-M. He's the  
 18 attorney that registered the corporation.  
 19 BY MR. HILLIARD:  
 20 Q. Is he a New Jersey attorney?  
 21 A. Yes.  
 22 Q. Do you know whether he still practices  
 23 law in New Jersey today?  
 24 A. I think he's temporary in Nigeria.  
 25 Q. I'm sorry?

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1 A. I know he's in Nigeria.  
 2 Q. He's in Nigeria physically now?  
 3 A. Physically, yes. He's been in Nigeria  
 4 when one of the governors in the meeting gave  
 5 him a position; so he went there. So he's  
 6 probably going to be coming back.  
 7 Q. But you don't know -- you don't know  
 8 when?  
 9 A. I don't know when.  
 10 Q. Do you know why you were asked by the  
 11 Executive Committee to be the one to form the  
 12 PCNI, Inc. subsidiary in the United States?  
 13 A. I don't know why.  
 14 Q. Did you volunteer?  
 15 A. I did not volunteer. I was directed to  
 16 do this.  
 17 Q. You were picked out of all the members?  
 18 A. I was picked out of all the members to  
 19 do it, and I did it.  
 20 Q. So as you sit here today, you have no  
 21 idea why they picked you?  
 22 A. I have no idea why they picked me.  
 23 Q. Who came up with the idea?  
 24 A. They did.  
 25 Q. They did. They had the idea. Okay.

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1 Do you know -- did they say anything --  
 2 and by "they," I mean executive committee.  
 3 Did they say anything at the meeting as  
 4 to why they wanted to do this? Not about why  
 5 you wanted to do it, but why they wanted to  
 6 form a company or an organization in the United  
 7 States as a subsidiary?  
 8 A. The club was expanding; many branches  
 9 and many more people. Many more people wanted  
 10 to form other branches, and they wanted to get  
 11 organized -- a registered business, and make  
 12 sure that the activities are legal here. Other  
 13 presence -- the details of why they want to do  
 14 it, I don't know. I was told to do it.  
 15 Q. Okay.  
 16 A. And I did it.  
 17 Q. Up to that point in time, 2010, when  
 18 you were asked to form the subsidiary  
 19 organization in the United States, am I correct  
 20 that PCNI's social club activities were  
 21 conducted exclusively through all the different  
 22 branches?  
 23 A. Yes.  
 24 Q. There was no umbrella organization in  
 25 the United States?

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1 A. No.  
 2 Q. And at that time you were a member in  
 3 the Princeton branch; correct?  
 4 A. Correct.  
 5 Q. Did the Princeton branch use a  
 6 particular logo for its social club activities?  
 7 A. I have one logo for People's Club.  
 8 Q. And is that the interlocking five-ring  
 9 logo?  
 10 A. Three-ring.  
 11 Q. Five? Three?  
 12 A. Three.  
 13 Q. Three. I apologize. The interlocking  
 14 three-ring? I'm thinking of the Olympics.  
 15 Sorry about that.  
 16 The interlocking three-ring logo. That  
 17 was the logo that the Princeton branch used;  
 18 right?  
 19 A. That's the logo for the club.  
 20 Q. All right. And is that, to your  
 21 knowledge, is that the same logo that all of  
 22 the other branches around the United States  
 23 use?  
 24 A. The People's Club, that's the logo.  
 25 Q. Okay. And they used those for years --

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1 all the branches used those -- that same logo  
 2 up to 2010?  
 3 A. Since 1971.  
 4 Q. 1971?  
 5 A. Yes.  
 6 Q. Is that when the first branch was  
 7 formed?  
 8 A. That's when the first club was started.  
 9 Q. In the United States?  
 10 A. In Nigeria.  
 11 Q. In Nigeria. Okay. 1971?  
 12 A. And the people that started the first  
 13 club had to go through a process to  
 14 establishing the first club in the United  
 15 States.  
 16 Q. Okay. After you were given the  
 17 direction to open or form the subsidiary, you  
 18 hired a lawyer. You told me you looked at the  
 19 constitution for PCNI in Nigeria, and you took  
 20 certain steps to complete what you were  
 21 directed to do. You told me that you opened a  
 22 bank account.  
 23 You formed the entity first; right?  
 24 A. (Witness nodded.)  
 25 Q. You have to verbalize. I'm sorry.

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1 A. When you finish, you let me know.  
 2 Q. You formed an entity; correct?  
 3 A. Yes.  
 4 Q. And then you opened a bank account?  
 5 A. Yes.  
 6 Q. With a New Jersey bank?  
 7 A. Yes.  
 8 Q. And was that bank account opened in the  
 9 name of the new entity?  
 10 A. Yes.  
 11 Q. And did you have signatory authority  
 12 over that bank account?  
 13 A. I'm one of the signatures.  
 14 Q. Are there others?  
 15 A. Oh, yes.  
 16 Q. Who were the others?  
 17 A. Onwuachu, the chairman, who was the  
 18 chairman there. Onwuachu Ilonze.  
 19 Q. Onwuachu, right.  
 20 A. Ilonze, I-L-O-N-Z-E, who was then the  
 21 treasurer. And Ogugua -- Desmond Ogugua.  
 22 D-E-S-M-O-N-D; Ogugua, O-G-U-G-U-A, who also  
 23 was a trustee of the club. They came to New  
 24 Jersey and put in their signature.  
 25 Q. They physically went to the bank --

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1 A. Physically went to the bank and put  
 2 their signatures in.  
 3 Q. -- and put their signatures in.  
 4 Am I correct that all three of these  
 5 gentlemen you just named are Nigerian  
 6 residents?  
 7 A. Yes.  
 8 Q. They live in Nigeria year round?  
 9 A. They live in Nigeria year round, yes.  
 10 Q. Okay. And they function as leaders  
 11 within PCNI Nigeria overseas?  
 12 A. They function as PCNI Nigeria  
 13 worldwide.  
 14 Q. Worldwide.  
 15 A. Britain, Canada, United States,  
 16 whatever there's a People's Club of Nigeria;  
 17 they're the leader.  
 18 Q. Okay. Did you -- you mentioned earlier  
 19 that you undertook some steps to form -- to  
 20 seek 501(c)(3) status for this newly formed  
 21 entity?  
 22 A. Those were the directions given to me.  
 23 Q. And did you do that?  
 24 A. It was to be started, but the  
 25 constitution needs -- needed to be modified in

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1 order to do that. We're still in the process,  
 2 that has not been done.  
 3 Q. What, in your understanding needed --  
 4 needed, or still needs to be done to the  
 5 constitution to permit you to make application  
 6 for tax exempt status under 501(c)(3)?  
 7 A. The -- I can't remember what the lawyer  
 8 said. The -- the way we had to do some kind of  
 9 constitution in Nigeria. It was in the process  
 10 of being revised. And he -- when that is  
 11 complete, we'll take whatever was done, and  
 12 there needed to be a statement in that  
 13 constitution, but 501(c)(3) criteria --  
 14 Q. Okay.  
 15 A. -- so that they can work here. That --  
 16 that's what I was told.  
 17 Q. That has not been done yet?  
 18 A. That has not been done.  
 19 Q. Have you -- so am I correct that you  
 20 are -- as far as the U.S. Government Taxing  
 21 Authorities are concerned, you are -- you  
 22 believe that you are a for-profit corporation  
 23 right now?  
 24 A. No, not-for-profit.  
 25 Q. You're not-for-profit?

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1 A. Not-for-profit.  
 2 Q. You were not-for-profit, but you have  
 3 not applied for tax exempt status as a  
 4 not-for-profit; is that correct?  
 5 A. The taxes has not been applied, as far  
 6 as I know.  
 7 Q. All right. Do you submit -- by "you,"  
 8 I mean, does PCNI, Inc., the New Jersey -- and  
 9 this was a New Jersey Corporation you formed;  
 10 correct?  
 11 Does PCNI, Inc., the New Jersey  
 12 company, file tax returns with the government?  
 13 A. They file no returns.  
 14 Q. They do not file any returns?  
 15 A. They do file returns.  
 16 Q. They do file returns? Okay.  
 17 And do you have an accountant who does  
 18 that?  
 19 A. Yes.  
 20 Q. Who is your accountant?  
 21 A. Mr. Okeke. O-K-E-K-E. He's the one  
 22 that's done our returns to date.  
 23 Q. And am I correct, that he has been  
 24 filing tax returns for this subsidiary, PCNI,  
 25 Inc. since it was formed in 2010?

1 A. That's not -- they -- they -- PCNI has  
 2 not made any money from the tax return.  
 3 Q. But have you been filing informational  
 4 returns with the government?  
 5 A. Yes, yes.  
 6 Q. Do you review those returns before  
 7 they're filed with the government?  
 8 A. He does.  
 9 Q. Do you personally?  
 10 A. I get the form and give it to him.  
 11 Q. Do you sign them?  
 12 A. I don't. He signs them on behalf, I  
 13 think.  
 14 Q. He does?  
 15 A. Yes.  
 16 Q. The accountant?  
 17 A. Yes.  
 18 Q. But you review them before they're  
 19 filed?  
 20 A. Reviewed what?  
 21 Q. The informational tax returns.  
 22 A. I don't understand what you're talking  
 23 about.  
 24 Q. Do you review the tax returns before he  
 25 files them, whether he files them

1 electronically or on paper?  
 2 Do you see them before -- do you have  
 3 to approve them?  
 4 A. It's done electronically.  
 5 Q. Right.  
 6 A. I get the paper and supply the form to  
 7 him.  
 8 Q. But you approved them?  
 9 A. And I give him the form. He registers,  
 10 and he gave me the registered certificate.  
 11 Q. Do you have copies of the tax returns,  
 12 the informational returns that have been filed  
 13 by PCNI, Inc.? Do you personally have them?  
 14 A. I have a copy of the returns and my  
 15 return from the United States, yes.  
 16 Q. For each of the years in which they  
 17 were filed?  
 18 A. Yes.  
 19 Q. And you also filed informational  
 20 returns at the State of New Jersey as a New  
 21 Jersey entity?  
 22 A. That's what I'm referring to, yes.  
 23 Q. Well, there may be two different -- you  
 24 may file with the State of New Jersey. Do you  
 25 also file with the Internal Revenue Service?

1 A. Internal Revenue Service. We haven't  
 2 made any money.  
 3 Q. I understand -- I understand that, but  
 4 I'm asking if you filed any informational  
 5 returns to show the IRS, we haven't made any  
 6 money, so we owe nothing, but here's our  
 7 return.  
 8 A. I don't remember that.  
 9 Q. Okay. Would you have -- do you believe  
 10 you would have records at your residence at 16  
 11 Wright Street, which would include any tax  
 12 files that were made by the entity with the  
 13 government?  
 14 A. I have -- should have records, yes, of  
 15 whatever we need for the government.  
 16 Q. Okay. Other than what you've described  
 17 for me already, sir, did you do anything else  
 18 in 2010 to set up PCNI, Inc., the New Jersey  
 19 subsidiary and start to operate it?  
 20 A. The only thing we did was the trademark  
 21 application.  
 22 Q. The reason we're here today, in part,  
 23 the trademark application?  
 24 A. That was the initial application we did  
 25 , an application then to protect our trademark.

1 Q. Whose trademark?  
 2 A. People's Club of Nigeria International  
 3 trademark.  
 4 Q. Okay. Were you directed at that  
 5 executive committee meeting in Houston to  
 6 pursue a trademark registration?  
 7 Did that come up at that meeting?  
 8 A. That was one of the three things that I  
 9 was told to do.  
 10 Q. Okay. At that meeting?  
 11 A. At that meeting, yes.  
 12 Q. Okay. Do you recall if anything was  
 13 said at that meeting about why the Executive  
 14 Committee wanted to file an application for  
 15 registration of its trademark People's Club of  
 16 Nigeria International in the United States at  
 17 that time?  
 18 Were you told why?  
 19 A. To protect the use of our mark by  
 20 non-members.  
 21 Q. When you say non-members, who do you  
 22 mean?  
 23 A. The first Club of Nigeria  
 24 International. People who are not active  
 25 members of People's Club of Nigeria

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1 International.

2 Q. Okay. At that time, though, were all

3 of the branches, including the ones you

4 mentioned before at the time of that executive

5 committee meeting, were they all members?

6 A. Of course this is. They're all

7 branches for the Club of Nigeria.

8 Q. So they were all members?

9 A. Yes.

10 Q. So as you understand --

11 A. If they paid their dues.

12 Q. They pay their dues.

13 A. They can be a member this year and not

14 a member next year.

15 Q. If you don't pay your dues?

16 A. The only reason you're a member is if

17 you pay the annual dues. It's called asset

18 dues.

19 Small amount of money, but you have to

20 pay it every year. If you don't pay at the end

21 of April, you are out of status, and you are

22 not a member. And if your branch at that time

23 falls below 20 members, you're not a branch

24 anymore. Then your license can be withdrawn.

25 That is criteria.

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1 Q. Twenty members?

2 A. Twenty members for branches. Twenty

3 active members for branches. And each member

4 has to pay assets.

5 THE COURT REPORTER: Assets?

6 THE WITNESS: Social security. It's

7 called social security.

8 BY MR. HILLIARD:

9 Q. Okay. Okay. So at the time of this

10 Executive Committee meeting in Houston in 2010,

11 it was when the Executive Committee asked you

12 to pursue a trademark application. It was your

13 understanding as a member -- correct me if I'm

14 wrong, as your understanding as a member that

15 up to that point in time, there were a number

16 of branches consisting of dues-paying members,

17 who if they paid their dues, maintained their

18 standing, were entitled to use the trademark?

19 A. Yes.

20 Q. The three-ring logo and the name;

21 correct?

22 A. Yes, yes.

23 Q. Okay. In fact, that name had been used

24 by all or most of the branches up to that point

25 in time; correct?

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1 A. All.

2 Q. By all, including the Princeton branch,

3 right?

4 A. Yes.

5 Q. The Princeton Junction branch; correct?

6 A. Yes.

7 Q. And Miami branch?

8 A. Yes.

9 Q. The Chicago branch?

10 A. Yes.

11 Q. They all had been using the logo for

12 years up until that point in time?

13 A. They were -- they were members of the

14 branches of the People's Club of Nigeria.

15 Q. Okay.

16 A. They were entitled to it, yes.

17 Q. Did the status of any of those branches

18 -- and whether they were branches who were

19 entitled to use the trademark -- come up at

20 that meeting in Houston in 2010?

21 A. I don't understand your question.

22 Q. Sure. Let me rephrase it. I'm glad

23 you asked me to rephrase it because it was a

24 confusing question.

25 At the time of the meeting in Houston

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1 when you were asked to pursue a trademark

2 application, did you have a belief that there

3 was anyone out there who was not entitled to

4 use the trademark as a branch?

5 Any of the branches that were using it

6 unlawfully or were not properly used; did that

7 -- did that subject come up?

8 A. No, none of the branches were. You

9 can't use it if you are not a branch.

10 Q. And you can't use it if you're not a

11 branch, and you can't be a branch if you don't

12 use it? You're required to use it?

13 A. You're required to use it, yes.

14 Q. You have to use it?

15 A. You have to use it.

16 Q. Otherwise, if you don't use the logo of

17 the trademark, you can be expelled as a branch;

18 correct?

19 A. I don't understand that.

20 Q. But you have to use it?

21 A. You have to use it. Correct.

22 Q. Okay. Were there any issues with any

23 of the branches at that time in 2010, when you

24 were asked to pursue the trademark application?

25 A. No.

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1 Q. Okay.

2 A. All our branches were related.

3 Q. And if I understand your testimony

4 correctly, if your branch was chartered by PCNI

5 Nigeria, and you had at least 20 active

6 members, and your members paid their dues, you

7 were entitled under the constitution to

8 maintain your standing as a branch; correct?

9 A. Yes.

10 Q. And entitled to use the trademark?

11 A. Yes.

12 Q. Okay. Why don't we take a quick break.

13

14 (A short break was taken.)

15

16 MR. HILLIARD: We are back on the

17 record.

18 BY MR. HILLIARD:

19 Q. Dr. Mgbako, I forgot to ask you earlier

20 in the beginning of the deposition, and I

21 apologize for this, but I wanted to make sure

22 that I clarified for the record, the position

23 in which you're testifying today.

24 By that, I mean, I provided Mr. Swyers

25 with what's called a notice to take deposition.

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1 It's a formal notice that's issued in the

2 proceeding, and I issued the notice to have you

3 here individually, personally. I also issued

4 the notice to People's Club of Nigeria

5 International, Inc. for you to be here as -- or

6 for the organization to produce someone who is

7 authorized to testify on the company's behalf.

8 And the reason I did that is because in

9 some instances, the organization may designate

10 five different people to testify in five

11 different subjects, but my understanding is

12 that you and Mr. Swyers have designated you as

13 the only person with knowledge of the facts to

14 be here today to testify; is that correct?

15 A. Of the trademark, yes.

16 Q. About the trademark?

17 MR. SWYERS: Clarify he's not the only

18 person, but I think you asked for a person

19 with knowledge, not the only person with.

20 MR. HILLIARD: That's correct.

21 Consistent with the rule. I didn't mean to

22 misspeak about that.

23 BY MR. HILLIARD:

24 Q. But that you are the person with the

25 most knowledge about the preparation of the

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1 trademark application and the use of the mark

2 by PCNI, Inc. and the subjects who were listed

3 in the deposition; is that correct?

4 A. Correct.

5 Q. Okay. Thank you.

6 When we took a break, I was asking you

7 some questions about the formation and initial

8 activities of PCNI, Inc., the New Jersey

9 entity.

10 Am I correct, that from the very

11 beginning you were designated by leadership in

12 Nigeria to be the agent representing that

13 company; correct?

14 A. Yes.

15 Q. Okay. Were you ever referred to as

16 temporary agent?

17 Have you ever seen that?

18 A. No.

19 Q. Did anyone within the leadership of

20 PCNI Nigeria, ever tell you that you were being

21 replaced by anyone as the agent for People's

22 Club of Nigeria International, Inc.?

23 A. No.

24 Q. Did you ever learn from anyone -- not

25 just the leadership -- did anyone ever tell

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1 you, you're no longer authorized as an agent of

2 the People's Club of Nigeria International,

3 Inc. New Jersey?

4 A. No.

5 Q. So as far as you're concerned, your

6 understanding is that you have been the -- the

7 registered agent for that company since the day

8 it was formed in 2010?

9 A. Yes.

10 Q. After you formed the company, what, if

11 any, steps did you take to start to pursue a

12 trademark application with the U.S. Government?

13 What did you do? What did you do?

14 A. The lawyer, Sebastian Ibezim, initiated

15 the first application with some -- a group

16 called Clover. I don't remember the exact

17 name.

18 THE COURT REPORTER: Clover?

19 THE WITNESS: Klauber. K-L-A-U-B-E-R,

20 at trademark --

21 Q. K-L-A-U-B-E-R?

22 A. I think it's K-L-A-U-B-E-R.

23 Q. Klauber. Is that referring to a law

24 firm?

25 A. Yeah. I think it's a law firm that

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1 does trademark.  
 2 Q. Would it be Klauber & Jackson?  
 3 A. It's possible, yes.  
 4 Q. K-L-A-U-B-E-R?  
 5 A. Yes, that's B-E-R.  
 6 Q. That sounds more familiar?  
 7 A. Yes.  
 8 Q. Okay. Okay. And that was -- was that  
 9 a New Jersey law firm?  
 10 A. No. I don't know where they are. The  
 11 lawyer was the one that contacted them, and  
 12 they made an initial search, and I was asked to  
 13 pay money, so that they can initiate the  
 14 application, and they were given money. They  
 15 were paid a thousand -- a thousand something.  
 16 I don't know the exact amount through the  
 17 lawyer. That was it. We didn't hear from  
 18 there until I got to the trademark attorney in  
 19 2013.  
 20 Q. And to whom are you referring when you  
 21 say the "trademark attorney"?  
 22 Are you referring to Mr. Swyers?  
 23 A. Yes.  
 24 Q. Okay. And that was in 2013?  
 25 A. Yes.

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1 Q. So, let's stick for a moment with that  
 2 first application process. You just told me  
 3 that your attorney contacted Klauber & Jackson.  
 4 They were retained to pursue a search.  
 5 You described a search?  
 6 A. Yes.  
 7 Q. What do you mean by "search"?  
 8 A. What do I mean by "search"?  
 9 I think before they filed the  
 10 application, they have to do a U.S. search.  
 11 Q. What is your understanding of what the  
 12 purpose of the search was?  
 13 A. To find out if the trademark is being  
 14 used by anybody -- legally.  
 15 Q. Okay. Okay.  
 16 A. And if the trademark is not being used  
 17 by anybody legally, then you can file an  
 18 application. That's -- that's my  
 19 understanding.  
 20 Q. Okay. Do you recall writing a check  
 21 out of your -- out of that bank account in New  
 22 Jersey to pay for that search?  
 23 A. Yes.  
 24 Q. Did you see the results of that search?  
 25 A. Yes.

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1 Q. Did it come in a booklet form?  
 2 A. No.  
 3 Q. How did you see it?  
 4 A. I got an email that I got from the  
 5 lawyer. The lawyer emailed -- directed an  
 6 email to me.  
 7 Q. I see. Is that -- that's your  
 8 recollection?  
 9 A. Yes.  
 10 Q. Was it a long email, or was it -- what  
 11 do you remember about that email?  
 12 A. That email, I don't remember much.  
 13 They -- the bottom line is, other than People's  
 14 Club of Nigeria International, I mean, Club of  
 15 Nigeria International, there's no other user of  
 16 that trademark, and the application could go  
 17 through.  
 18 Q. Okay. But up to that point in time,  
 19 all the branches have been using it; correct?  
 20 A. Oh, no. That's not what I discussed.  
 21 I was talking about registration, not legally  
 22 using the name. I'm talking about a  
 23 registration trademark.  
 24 Q. I see. I see. So is it your  
 25 understanding that the search was confined just

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1 to people or entities that had an actual  
 2 registration of the trademark?  
 3 A. I don't know what they do search. I  
 4 have no knowledge of what a search means. Just  
 5 pay for it, and they give you the results.  
 6 Q. Okay. Well, I can tell you that there  
 7 are different ways of doing searches and lots  
 8 of different results, and that's the reason I  
 9 was asking. Did you get anything other than a  
 10 simple email as the result of the search?  
 11 Did you get anything like a thick  
 12 booklet that had a lot of things in it?  
 13 A. I'm not -- all I know, I was asked to  
 14 pay money for a search. The search was done,  
 15 and I was told we can go ahead with the  
 16 application.  
 17 Q. Okay.  
 18 A. That's all I can confirm.  
 19 Q. Did you then authorize -- once you got  
 20 that email, did you then authorize an attorney  
 21 to go ahead and make the filing?  
 22 A. I authorized the attorney to go ahead  
 23 and make the application.  
 24 Q. And was it your understanding that  
 25 Klauber & Jackson was doing it?

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1 A. That's what I thought, and then nothing  
 2 happened for years.  
 3 Q. Do you know why?  
 4 A. I don't know why.  
 5 Q. Did you inquire?  
 6 A. I don't know why. By the time we  
 7 decided to pursue it actively, the lawyer --  
 8 THE COURT REPORTER: Decided to pursue  
 9 what?  
 10 A. To pursue the application. The lawyer  
 11 wasn't here. The lawyer had gone to Nigeria,  
 12 so I had to get another lawyer.  
 13 BY MR. HILLIARD:  
 14 Q. I see. So as you sit here today, you  
 15 don't have any recollection as to why the  
 16 attorneys did not make any progress in filing  
 17 the application?  
 18 A. Correct.  
 19 Q. Did -- were you receiving any requests  
 20 for updates from the leadership in Nigeria  
 21 about where the trademark registration  
 22 application stood over the course of years when  
 23 nothing was happening?  
 24 A. What year?  
 25 Q. Well, you told me that you had -- you

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1 thought Klauber & Jackson were pursuing the  
 2 application and then nothing happened for  
 3 years.  
 4 A. Yes.  
 5 Q. During that period of time, were you  
 6 being questioned?  
 7 Where does it stand?  
 8 A. The only time it was questioned was in  
 9 2013.  
 10 Q. How was it questioned? How was it  
 11 raised?  
 12 A. The meeting of the leadership core  
 13 group.  
 14 Q. Leadership core?  
 15 A. A leadership core group is a -- is a  
 16 group of chairmen of our branches. They meet,  
 17 and they were talking about the affairs of the  
 18 club, and they asked what happened to the  
 19 trademark application.  
 20 And that's when I went back and tried  
 21 to get to Klauber, and found out that the  
 22 application was inactive, and I had to get  
 23 another lawyer.  
 24 Q. When you say "inactive," what do you  
 25 mean?

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1 A. Nothing was happening.  
 2 Q. Do you know whether or not anything had  
 3 actually been filed with the government?  
 4 A. I don't know.  
 5 Q. You just learned that it had been  
 6 inactive?  
 7 A. I just learned they archived the  
 8 application.  
 9 Q. All right. And the first time this was  
 10 coming up in your mind at least over the last  
 11 couple of years, leading up to this leadership  
 12 core group, is when it came up in that meeting?  
 13 A. Yes.  
 14 Q. Where was this meeting held in?  
 15 A. Teleconference.  
 16 Q. It was a teleconference.  
 17 And who made up -- at the time of that  
 18 teleconference, who made up the leadership core  
 19 group?  
 20 A. The chairman of the branches.  
 21 Q. The chairman of each of the branches?  
 22 A. The chairman and secretary of the  
 23 branches.  
 24 Q. Of that group?  
 25 A. Of People's Club of Nigeria branches in

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1 the United States.  
 2 Q. I see. So did the leadership core  
 3 group include every single -- at that time --  
 4 recognized branch of the United States?  
 5 A. Recognize branch secretary, branch  
 6 chairman and branch secretary.  
 7 Q. So sounds like there were at least a  
 8 couple of dozen people on this teleconference;  
 9 right?  
 10 A. Yeah, including there were about 20.  
 11 Q. Okay.  
 12 A. Twenty-one branches. Sorry. Talking  
 13 about 42 people.  
 14 Q. Do you recall who raised the question  
 15 about the status of the trademark application?  
 16 A. I don't recall.  
 17 Q. Was the decision made during this  
 18 teleconference about how to handle this  
 19 trademark application at that time on what to  
 20 do?  
 21 A. Yes.  
 22 Q. What was the decision?  
 23 A. The decision then was to reapply. The  
 24 instruction was that I reapply, because I was  
 25 the one that did it the first time.

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1 Q. So it fell in your lap again?  
2 A. Yes.  
3 Q. And this teleconference occurred  
4 sometime in 2013?  
5 A. Yes.  
6 Q. So what did you do?  
7 After the teleconference was over, what  
8 steps did you take?  
9 A. I contacted a trademark attorney, and  
10 they initiated the application.  
11 Q. And that's Mr. Swyers and his  
12 organization?  
13 A. Yes.  
14 Q. How did you find Mr. Swyers?  
15 And as I ask a couple of questions  
16 about Mr. Swyers, I want to press upon you not  
17 to talk about your communications with him,  
18 because that's covered by something called  
19 attorney/client privilege.  
20 I simply want to know, you know, basic  
21 facts about, how did you come to find him, and  
22 when did you retain him? So how did you find  
23 Mr. Swyers?  
24 A. I Googled Internet.  
25 Q. Okay. Found him listed?

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1 A. Found him listed.  
2 Q. Contacted him and then engaged him?  
3 A. Contacted the office, talked to them,  
4 and was impressed, if I remember, and decided  
5 to go through the application with the company.  
6 Q. Okay. Was this done through a written  
7 engagement letter between you and his firm?  
8 A. Telephone.  
9 Q. Telephone? Nothing in writing? No  
10 exchange?  
11 A. Telephone.  
12 Q. All telephone. Okay.  
13 MR. SWYERS: And also I'm going to go  
14 ahead and put an objection. I'm not quite  
15 sure that this is reasonably calculated to  
16 lead to the discovery of admissible evidence  
17 in trial -- mainly our relationship with  
18 this client.  
19 MR. HILLIARD: I understand. I was  
20 just looking to establish the chronology in  
21 the timeline. That's all.  
22 BY MR. HILLIARD:  
23 Q. Do you recall when you retained  
24 Mr. Swyers and his firm?  
25 A. I don't know the exact date, no.

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1 Q. Was it in 2013?  
2 A. I believe so.  
3 Q. And did he thereafter prepare a  
4 trademark application to submit to the U.S.  
5 Patent and Trademark Office on behalf of the  
6 company?  
7 A. Yes.  
8 Q. Okay. On behalf of what company? Who  
9 were you --  
10 A. People's Club of Nigeria International  
11 subsidiary in New Jersey.  
12 Q. New Jersey? Okay.  
13 He was engaged -- so Mr. Swyers was  
14 engaged to represent People's Club of Nigeria  
15 International, Inc., the New Jersey company?  
16 A. For the application.  
17 Q. For the application.  
18 Have you ever seen anything in writing  
19 between People's Club of Nigeria International,  
20 the Nigerian entity and the New Jersey  
21 subsidiary PCNI, Inc.?  
22 Have you ever seen anything in writing  
23 between those two entities relating to  
24 authorization to file the trademark  
25 application?

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1 A. I don't understand the question.  
2 Q. Sure. Did you ever see anything in  
3 writing from anyone of People's Club of Nigeria  
4 International that gave the New Jersey entity  
5 authority to file the trademark application?  
6 A. I thought I just explained to you the  
7 process.  
8 Q. You did. You did. I want to know if  
9 there -- was there anything in writing? You  
10 told me that there were discussions in an  
11 executive committee meeting and --  
12 A. There may be something in the minutes,  
13 so I don't know. I can't answer.  
14 Q. Okay. Okay. You know as you sit here  
15 today, you don't recall anything?  
16 A. I, meaning, if you're talking about a  
17 separate -- a separate letter, then I don't  
18 recall anything.  
19 Q. A letter --  
20 A. But there are minutes to that  
21 discussion.  
22 Q. Nothing in writing that you can recall  
23 right now as you sit here?  
24 A. I don't understand what you're  
25 referring to.

1 Q. Okay. Just to be clear, I simply  
 2 wanted to know if you have a recollection,  
 3 sitting here, of any documents exchanged that  
 4 the Nigerian entity said to the subsidiary, you  
 5 have the right to file the trademark  
 6 application on our behalf. You have the right  
 7 to pursue this in the United States.  
 8 A. I just said to you that I was told to  
 9 do that.  
 10 Q. Told to do that, right, I meant in  
 11 writing.  
 12 A. And why would I go back and put  
 13 something in writing, it's in the minutes.  
 14 Q. I'm not questioning whether --  
 15 A. If you recall asking what I recall, I  
 16 don't recall anything.  
 17 Q. I wasn't questioning what you did and  
 18 why you did it. I was just simply asking if  
 19 you know whether there was anything in writing.  
 20 Okay?  
 21 Did you review the trademark  
 22 application itself -- the document itself --  
 23 before it was filed -- the one that Mr. Swyers  
 24 just prepared?  
 25 A. Yes.

1 Q. You did? You looked at it?  
 2 A. Yes.  
 3 Q. Did you approve it?  
 4 A. Yes.  
 5 Q. Did you make any changes to it?  
 6 A. The initial application?  
 7 Q. Yes.  
 8 A. No. The application was filed in, I  
 9 believe it was in November 2013, yes. And --  
 10 Q. Okay.  
 11 MR. HILLIARD: I just have a few  
 12 documents, Matt. You're there, right?  
 13 MR. SWYERS: Hi, I'm here.  
 14 MR. HILLIARD: Yeah. Okay.  
 15 MR. SWYERS: Right.  
 16 MR. HILLIARD: I'm going to mark and  
 17 show him the original application.  
 18 MR. SWYERS: Thank you. I got it.  
 19 MR. HILLIARD: The reporter has to mark  
 20 this first. I'm sorry. It will be P-1.  
 21  
 22 (Plaintiff's Exhibit Number 1,  
 23 Trademark Application, was marked for  
 24 identification.)  
 25

1 MR. HILLIARD: As I printed out off  
 2 TEAS, it's nine pages.  
 3 MR. SWYERS: Okay.  
 4 MR. HILLIARD: It ends with the  
 5 declaration and then the specimen. And then  
 6 the letterhead. The letterhead is the last  
 7 page.  
 8 BY MR. HILLIARD:  
 9 Q. Dr. Mgbako, I place in front of you  
 10 what's been marked as P-1 for identification.  
 11 If you can take a moment to look at that, and  
 12 then I will ask you just a few questions about  
 13 it.  
 14 MR. SWYERS: And while he's looking at  
 15 that.  
 16 What letterhead are you speaking of?  
 17 MR. HILLIARD: This is the application  
 18 that was filed on November 12, 2013.  
 19 MR. SWYERS: Yes.  
 20 MR. HILLIARD: And the last two pages  
 21 consist of a specimen, which is just the  
 22 name PCNI in block lettering and then the  
 23 three-ring logo. And then right behind that  
 24 is a letterhead that has handwritten scroll  
 25 on it.

1 MR. SWYERS: Now, I understand, that's  
 2 the specimen. Okay. Gotcha.  
 3 MR. HILLIARD: Right. I think that --  
 4 well, I guess both pages might be the  
 5 specimen. You might have submitted it as a  
 6 specimen. That's correct.  
 7 MR. SWYERS: Okay, thank you.  
 8 MR. HILLIARD: All right.  
 9 BY MR. HILLIARD:  
 10 Q. Do you recognize P-1, Doctor?  
 11 A. Yes, I do.  
 12 Q. Is this a -- a copy of the trademark  
 13 registration application filed with the U.S.  
 14 Patent and Trademark Office?  
 15 A. Yes.  
 16 Q. You reviewed this before it was filed;  
 17 correct?  
 18 A. Yes.  
 19 Q. Okay. And did you believe everything  
 20 in it to be true and accurate?  
 21 A. Yes.  
 22 Q. And did you understand at the time that  
 23 you approved it, that you were expected to make  
 24 sure that what you were submitting to the U.S.  
 25 Patent Trademark Office was truthful and

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1 accurate?  
2 A. Yes.  
3  
4 (Pause.)  
5  
6 MR. HILLIARD: Are you there?  
7 MR. SWYERS: Yes. Sorry about that. I  
8 got dropped right when you were saying is  
9 this the trademark application, and then it  
10 was busy for about a minute.  
11 MR. HILLIARD: Oh, okay. Yeah, I asked  
12 is this a copy of the trademark application.  
13 He said yes and then -- I can have you read  
14 it back. You --  
15 THE COURT REPORTER: Do you want the  
16 last question?  
17 MR. HILLIARD: Can you hear?  
18 MR. SWYERS: Yeah. I can finally --  
19 MR. HILLIARD: Probably right after  
20 that. I think I basically asked him: Is  
21 everything in here truthful and accurate?  
22 Did you understand at the time of the filing  
23 that you were expected to --  
24 THE COURT REPORTER: Right. That was  
25 your last question.

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1 MR. HILLIARD: That you -- you know,  
2 you were expected to submit only something  
3 that was truthful and accurate to the U.S.  
4 PTO, and he said yes. I think that was it.  
5 MR. SWYERS: I'm not that concerned  
6 about this section. Thank you.  
7 MR. HILLIARD: No problem. No problem.  
8 MR. SWYERS: Thank you.  
9 BY MR. HILLIARD:  
10 Q. Can I direct your attention to the  
11 second-to-the-last page of the document?  
12 That appears to be just the name,  
13 People's Club of Nigeria International at the  
14 top; and it's not in color; it's in black and  
15 white. But it's a -- it's the three-ring logo  
16 design that we were referring to; correct?  
17 A. Yes.  
18 Q. Is that the trademark for which you  
19 were seeking registration from the U.S. PTO?  
20 A. Yes, that's the trademark, yes.  
21 Q. And the -- I'll call it the parent  
22 organization in Nigeria; is that known as PCNI?  
23 A. It was known as Nigeria International.  
24 Q. It is? It's not known simply as  
25 People's Club of Nigeria, in Nigeria?

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1 A. That's the way it was. Now, it's  
2 People's Club of Nigeria International. It  
3 started off as People's Club of Nigeria and  
4 became "international" and the "international"  
5 word was added.  
6 Q. I see. So originally it was PCN for  
7 short?  
8 A. People's Club of Nigeria.  
9 Q. When it was formed in 1971?  
10 A. It wasn't international.  
11 Q. When did it become PCNI?  
12 When was the "international" added?  
13 A. When it become international, and you  
14 are looking at late '80s -- 1988, '90.  
15 Q. Okay.  
16 A. That's when the word "international"  
17 was added. I can't give you the exact date.  
18 Q. I see.  
19 A. That's my understanding.  
20 Q. Now, at the time you -- you authorized  
21 this application to be filed with the U.S.  
22 Patent and Trademark Office, if you see, sir,  
23 the date of the actual filing is on the front  
24 cover page, which is November 12th in 2013.  
25 That's when it was actually filed?

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1 A. Yes.  
2 Q. As of that date, did you believe that  
3 all of the existing branches in the United  
4 States had the authority to use the trademark  
5 which we just looked at, second-to-last page?  
6 A. Yes.  
7 Q. Okay. Including the Princeton Junction  
8 branch?  
9 A. Yes.  
10 Q. Chicago branch?  
11 A. Yes.  
12 Q. Miami branch?  
13 A. Yes.  
14 Q. Everyone else?  
15 A. Yes.  
16 Q. Okay. And -- strike that.  
17 Now, can I ask you to look at the next  
18 page. This appears to be a letterhead;  
19 correct?  
20 A. Yes.  
21 Q. Did you create this letterhead?  
22 A. Yes.  
23 Q. Did you create it in connection with  
24 forming the subsidiary in New Jersey in 2010?  
25 A. Yes.

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1 Q. Did you first create this letterhead --  
 2 strike that.  
 3 So you first started using this form of  
 4 letterhead. I don't mean the handwriting in  
 5 the middle of the document. This form of  
 6 letterhead, you first started using it in 2010?  
 7 A. When it was created, yes.  
 8 Q. And the United States address for  
 9 People's Club of Nigeria International is  
 10 listed as your home; correct?  
 11 A. 16 Wright Street, yes.  
 12 Q. How did you create this list of USA  
 13 branches that are listed down the left-hand  
 14 side of this document?  
 15 A. How did I create it? I don't  
 16 understand.  
 17 Q. How did you put that together? You  
 18 created the letterhead, so where did you get  
 19 this information from?  
 20 A. These are the legitimate branches.  
 21 Q. And you just knew that?  
 22 A. Yes.  
 23 Q. Okay. Were there any branches here  
 24 that were left off of the list?  
 25 A. No. All these branches here are

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1 legitimate branches at the time, yes.  
 2 Q. Is that your handwriting in the middle  
 3 of the document?  
 4 A. That's me, yes.  
 5 Q. What does it say?  
 6 A. Info at the Trademark Company --  
 7 THE COURT REPORTER: Wait, wait. Say  
 8 that again?  
 9 THE WITNESS: Info.  
 10 MR. HILLIARD: Info. I-N-F-O.  
 11 THE COURT REPORTER: Okay. Info.  
 12 THE WITNESS: Info@thetrademarkcompany.  
 13 com.  
 14 BY MR. HILLIARD:  
 15 Q. And then it says, attention new mark  
 16 design.  
 17 A. Yes.  
 18 Q. Why did you write that on the sheet?  
 19 Is this something that you were  
 20 providing to your lawyers?  
 21 A. That's -- why did I write it?  
 22 Q. Right.  
 23 A. I don't know why I wrote it. I can't  
 24 -- I don't recall why I wrote it, but I know I  
 25 sent some information to them. I don't know.

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1 Maybe I wrote it, that's what I told you.  
 2 Q. Now, in P-1, am I correct that you  
 3 believed at the time that this was filed that  
 4 you were filing this application on behalf of  
 5 the U.S. subsidiary --  
 6 A. Yes.  
 7 Q. -- PCNI, Inc., the New Jersey company?  
 8 A. I was filing the application on behalf  
 9 of People's Club of Nigeria International.  
 10 Q. Which -- which entity, though, when you  
 11 say People's Club of Nigeria International?  
 12 A. The club itself. The club. We have  
 13 one club. We don't have many. We have only  
 14 one club and branches. The club is People's  
 15 Club of Nigeria International. That's the only  
 16 club. There are no other clubs. We have  
 17 branches of the same club.  
 18 Q. Okay.  
 19 A. That's all, and you have a subsidiary  
 20 of that club.  
 21 Q. I see.  
 22 A. We don't have two clubs, we have one  
 23 club.  
 24 Q. One club which included all of the  
 25 branches?

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1 A. Which included all the branches and its  
 2 subsidiaries.  
 3 Q. Yes.  
 4 A. So I was doing it for the club, not for  
 5 this branch or for the subsidiary. I was doing  
 6 it for the People's Club.  
 7 Q. I see. Okay. So you believed at the  
 8 time that this was filed that you were filing  
 9 this on behalf of the Princeton Junction  
 10 branch?  
 11 A. On behalf of everybody.  
 12 Q. Including the Princeton Junction  
 13 branch?  
 14 A. All the branches listed here, including  
 15 the Princeton Junction, yes.  
 16 MR. HILLIARD: I'm going to mark this  
 17 as P-2.  
 18  
 19 (Plaintiff's Exhibit Number 2,  
 20 Response, was marked for identification.)  
 21  
 22 MR. HILLIARD: Matt?  
 23 MR. SWYERS: Yeah.  
 24 MR. HILLIARD: You there? Okay.  
 25 I'm now showing him the "Response to

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1 the Office Action."  
 2 MR. SWYERS: All right.  
 3 MR. HILLIARD: Which is one, two,  
 4 three, four, five -- six pages.  
 5 MR. SWYERS: I assumed it was dated  
 6 January/February 27th, 2014. There's one  
 7 for April 9th -- well, April 9th -- February  
 8 27th. I apologize. The Office Action is  
 9 February 27th.  
 10 MR. HILLIARD: Right.  
 11 MR. SWYERS: P-2 is just April 9th.  
 12 MR. HILLIARD: Yeah, P-2 is April 9th.  
 13 MR. SWYERS: All right. Fantastic.  
 14 Thank you.  
 15 BY MR. HILLIARD:  
 16 Q. Let me know when you've had a chance to  
 17 go through it.  
 18 Have you had a chance to look through  
 19 P-2?  
 20 A. Yes.  
 21 Q. Do you recognize it?  
 22 A. I believe so, yes.  
 23 Q. Okay. What do you understand this to  
 24 be?  
 25 A. I don't understand the question.

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1 Q. What do you understand this document to  
 2 be? You said you recognized it.  
 3 A. That's part of the application of the  
 4 trademark.  
 5 Q. Okay. Did you review this document  
 6 before it was filed with the U.S. PTO?  
 7 A. I believe I did, yes.  
 8 Q. Can I ask you to look at the last page.  
 9 This appears to be a form of a  
 10 letterhead; correct?  
 11 A. Yes.  
 12 Q. Okay. Am I correct that this is  
 13 different from the letterhead that we just  
 14 looked at that was attached to P-1?  
 15 A. Yes.  
 16 Q. When did you create this -- strike  
 17 that.  
 18 Did you create this letterhead?  
 19 A. Yes.  
 20 Q. You personally?  
 21 A. Yes.  
 22 Q. When did you create this letterhead?  
 23 A. In early 1994 -- 19 -- 2014. Sorry.  
 24 Q. Early in 2014?  
 25 A. Yes.

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1 Q. So after you filed the original  
 2 application --  
 3 A. That --  
 4 Q. -- marked P-1?  
 5 A. That's correct.  
 6 Q. Which was filed in November?  
 7 A. Yes.  
 8 Q. After you did that, you created this  
 9 new letterhead?  
 10 A. We had to change the letterhead, yes.  
 11 Q. Why did you have to change the  
 12 letterhead?  
 13 A. To reflect the status of the branches  
 14 at that time.  
 15 Q. Had it changed?  
 16 A. Yes.  
 17 Q. How did it change?  
 18 A. Three branches were dissolved.  
 19 Q. Which branches?  
 20 A. Princeton Junction, Miami, and Chicago.  
 21 Q. Did you personally participate in any  
 22 way in the actions taken to, quote, unquote,  
 23 dissolve those branches as you just testified?  
 24 A. Yes.  
 25 Q. What did you do? What was your role?

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1 A. I was -- two patrons of the club, we  
 2 were appointed.  
 3 Q. "Two" meaning you and someone else?  
 4 A. Yep.  
 5 Q. Who was the other person?  
 6 A. Professor Aluka.  
 7 THE COURT REPORTER: What name?  
 8 THE WITNESS: Professor Aluka,  
 9 A-L-U-K-A.  
 10 BY MR. HILLIARD:  
 11 Q. You and Professor Aluka --  
 12 A. Yes.  
 13 Q. -- as patrons were appointed --  
 14 A. Yes.  
 15 Q. -- to do what?  
 16 A. I'll explain it to you.  
 17 Q. Sure. Thank you.  
 18 A. There was a CEC meeting in Dallas in  
 19 2013, July. At that time the club was in  
 20 crisis. People's Club of Nigeria was in crisis  
 21 as a result of lawsuits filed by some U.S.  
 22 members in Nigerian courts.  
 23 Q. Who were these U.S. members that filed  
 24 the lawsuits in Nigerian courts?  
 25 A. Professor Ndubizu is one of them.

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1 THE COURT REPORTER: Professor --  
 2 THE WITNESS: Professor Ndubizu is one  
 3 of them.  
 4 BY MR. HILLIARD:  
 5 Q. The gentleman sitting to my left?  
 6 A. The gentlemen sitting -- right -- one  
 7 of them.  
 8 Q. Okay.  
 9 A. I can't give you all the details of all  
 10 of the individuals, but he's one of the three  
 11 patrons.  
 12 Q. And he was the leader in the Princeton  
 13 Junction branch; correct?  
 14 A. He was a patron. He was a patron, yes.  
 15 Not just Princeton, but patron of the club.  
 16 Q. Understood.  
 17 A. The lawyer is one of them. He's Dr.  
 18 Aloyeze. He was also a patron there. Aloyeze.  
 19 A-L-O-Y-E-Z-E.  
 20 THE COURT REPORTER: -- E-Z-E. You  
 21 said he was a doctor and a lawyer?  
 22 THE WITNESS: He's a doctor, not a  
 23 lawyer. Aloyeze. And he was another patron.  
 24 BY MR. HILLIARD:  
 25 Q. Who was the third?

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1 DR. NDUBIZU: Doctor --  
 2 MR. HILLIARD: You can't talk. I'm  
 3 sorry. Sorry about that. I didn't mean to  
 4 scold you, but you're not --  
 5 A. I know Dr. -- he's a physician -- Dr.  
 6 Fabian. I can't recall his last name.  
 7 THE COURT REPORTER: Dr. Fabian?  
 8 THE WITNESS: I can't recall the last  
 9 name.  
 10 THE COURT REPORTER: Okay.  
 11 BY MR. HILLIARD:  
 12 Q. Now, was he -- these last two gentlemen  
 13 you named, were they associated -- when I say  
 14 associated, were they associated with --  
 15 involved with a particular branch?  
 16 A. Yes.  
 17 Q. Miami and Chicago; would that be right?  
 18 A. Not Chicago.  
 19 Q. Okay.  
 20 A. You have Washington, D.C., Houston,  
 21 Chicago -- I can't give you the full details of  
 22 who filed the lawsuit, but these are the  
 23 patrons I know that filed. They're part of the  
 24 group.  
 25 Q. It was a legal action that was --

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1 A. There was a legal action in Nigeria.  
 2 Q. And it caused a great deal of  
 3 consternation and commotion within the club?  
 4 A. It caused a great deal of  
 5 consternation.  
 6 At that July meeting, if I remember --  
 7 at that July meeting, the decision was made by  
 8 the Central Executive Committee, people who  
 9 were there, that all branches, all branches  
 10 were to write a letter, okay, regarding the  
 11 action against the club. Okay?  
 12 The outcome of that is that five  
 13 branches in the United States sent a letter  
 14 that it did not meet the guidelines, so -- meet  
 15 the expectation of the club. So the club  
 16 decided to dissolve the activities of the  
 17 branches.  
 18 Q. Based on what that letter said?  
 19 A. Based -- I can't go into the details.  
 20 Q. You can't?  
 21 A. I cannot because I'm -- I'm not privy  
 22 to the details --  
 23 Q. I see.  
 24 A. -- of the decision to dissolve.  
 25 Q. You're not?

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1 A. No, I'm not privy to it. Okay.  
 2 But the outcome of it was that five  
 3 branches had the executive committee dissolved,  
 4 and they kept the committee appointed --  
 5 recommended to be appointed a caretaker  
 6 committee -- caretaker committee. The club  
 7 decided to get away from the executive and  
 8 appoint other leaders.  
 9 Q. Other leaders for those branches?  
 10 A. Yes, for those branches -- caretaker  
 11 committee. Okay. All the branches wrote a  
 12 letter and did whatever they were supposed to  
 13 do. These five branches did not.  
 14 Q. Who were the five branches that didn't?  
 15 I assume it was --  
 16 A. Washington, D.C., Houston, Princeton  
 17 Junction, Miami, and Chicago.  
 18 The letters, whatever the chairman  
 19 wrote, were not acceptable to the people that  
 20 made the decision. So the executives of these  
 21 branches were dissolved, and it was recommended  
 22 that the members appoint a caretaker committee  
 23 and take over the functions of those branches,  
 24 and then have another election and replace  
 25 them.

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1 Q. So the branches -- am I correct, then,  
 2 in terms of your testimony on behalf of the  
 3 entity, is that the branches themselves were  
 4 not dissolved? The leadership was being  
 5 changed?  
 6 A. I am -- I'm not done yet.  
 7 Q. You're not done yet. I'm sorry I cut  
 8 you off.  
 9 A. I'm giving you the information.  
 10 Q. I apologize. I cut you off. Go on.  
 11 Go on.  
 12 A. So the -- the branches were supposed to  
 13 come up with the caretaker committees. Okay.  
 14 Houston did, came up with a caretaker  
 15 committee and replaced their chairman;  
 16 Washington, D.C. came up with a caretaker  
 17 committee and replaced their chairman. Okay?  
 18 Chicago did not come up with a  
 19 caretaker committee; Miami did not come up with  
 20 a caretaker committee; Princeton Junction did  
 21 not come up with a caretaker committee.  
 22 Professor Aluka and myself were asked  
 23 to work with these branches regarding the  
 24 assets of the club. Okay? And we could not  
 25 get through to -- to Princeton Junction to help

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1 them create a caretaker committee; we could not  
 2 do the same thing with Chicago; we could not do  
 3 the same thing with Miami; and Professor Aluka  
 4 submitted a letter to the AGM meeting in  
 5 Nigeria where all branches gathered.  
 6 THE COURT REPORTER: Where all  
 7 branches?  
 8 THE WITNESS: Branches.  
 9 MR. HILLIARD: Gathered.  
 10 THE COURT REPORTER: Gathered. Okay.  
 11 A. We have offices of the branches.  
 12 Patrons and everybody else. We recommended  
 13 that these three branches be dissolved, because  
 14 we could not organize caretaker committees in  
 15 each of those branches, and they did not have  
 16 much assets for the club to worry about. Okay?  
 17 And our recommendation was approved at our  
 18 annual general meeting, and those three  
 19 branches were dissolved: Princeton Junction  
 20 dissolved; Chicago branch dissolved. Okay.  
 21 And Miami branch dissolved.  
 22 Q. Was that -- was that action on  
 23 dissolution for the three branches all taken at  
 24 the same meeting?  
 25 A. Same meeting.

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1 Q. Where was the meeting?  
 2 A. In Onitsha, Nigeria.  
 3 O-N-I-T-S-H-A. Onitsha, Nigeria.  
 4 Q. When was the meeting?  
 5 A. December 21st, 2013.  
 6 Q. Thirteen or 14?  
 7 A. Fourteen -- 13. Sorry. Sorry. Sorry.  
 8 Q. That's all right. I just want to make  
 9 sure.  
 10 A. No, no -- '13.  
 11 Q. December 31st of 2014 was the date --  
 12 A. December --  
 13 Q. I misspoke.  
 14 A. 21st.  
 15 Q. Late December?  
 16 A. Yeah.  
 17 Q. Yeah, late December of 2014.  
 18 A. That's where the decision was made to  
 19 dissolve those three branches, and the letter  
 20 to that effect was issued in January 2014 and  
 21 that prompted the removal.  
 22 Q. The witness is holding up the last page  
 23 of P-2 as he gives the testimony.  
 24 A. Yes. That led to the removal of the  
 25 three branches from the little branches.

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1 That's the only reason.  
 2 Q. On the letterhead that was submitted  
 3 with P-2?  
 4 A. Yes. Yes.  
 5 Q. This letter to which you referred to,  
 6 after the decision was made in Nigeria, this  
 7 was a letter that was sent to the branches?  
 8 A. Sent to everybody.  
 9 Q. Sent to everybody in the club?  
 10 A. Oh, right. The letter was generated.  
 11 I got a copy.  
 12 Q. Were any members of the three branches  
 13 who were being voted on for dissolution, were  
 14 any members there at Nigeria?  
 15 A. I have no knowledge of that.  
 16 Q. You weren't there?  
 17 A. I was not.  
 18 Q. You were simply advised of this by the  
 19 folks in Nigeria?  
 20 A. Yes.  
 21 Q. How were you advised? By letter? By  
 22 email? By a phone call?  
 23 A. By letter. I think I gave you a copy  
 24 of my letter.  
 25 Q. Advising of the decision in Nigeria?

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1 A. Yes.  
2 Q. And are you certain that that vote on  
3 the dissolution occurred sometime in December  
4 of 2013?  
5 A. Absolutely certain.  
6 Q. Okay. And it was after that that you  
7 created the letterhead that's attached to P-2?  
8 A. Yes.  
9 MR. SWYERS: And I apologize. I'm  
10 going to object. I think he testified  
11 December 13th -- December 2013.  
12 MR. HILLIARD: Well, he did originally,  
13 and then I asked him if it was 2014.  
14 THE WITNESS: No, no, 2013, because the  
15 letter is January 2014.  
16 MR. HILLIARD: All right. Okay. I  
17 didn't mean to -- I wasn't trying to -- I  
18 just wanted to know when.  
19 A. December '14 was just last December.  
20 I'm talking about December 2013 --  
21 BY MR. HILLIARD:  
22 Q. December 2013. Okay. That was when  
23 the vote occurred and right after that, you  
24 created that letterhead that's attached to P-2?  
25 A. The letterhead was created in response

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1 to the inquiry from my lawyers regarding --  
2 it's not stationary -- all the things that they  
3 needed for the final submission on the  
4 application.  
5 Q. Okay. Did you advise the U.S. Patent  
6 and Trademark Office that you were excluding  
7 certain branches from your application?  
8 A. Did I advise them?  
9 Q. Yes.  
10 A. I have no direct -- I have no direct  
11 communication with them. I only -- I -- my  
12 connection -- contact with them was through my  
13 lawyer.  
14 Q. Okay.  
15 A. The letterhead is there. The  
16 letterhead was here and specific. There were  
17 members there given information, they should  
18 have read it.  
19 Q. Okay.  
20 A. Am I required to -- I don't think I'm  
21 required to call them and advise them of this.  
22 Q. Do you know why you were submitting  
23 this revised letterhead, this changed  
24 letterhead to the U.S. Patent and Trademark  
25 Office?

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1 Why were you doing that?  
2 A. There were questions asked about the  
3 rings and all this -- just not part of the  
4 letterhead. The lawyer contacted me. They  
5 needed more information with other things that  
6 they wanted in addition; that's when this was  
7 done. That's the response.  
8 Q. At the time you changed the letterhead,  
9 was there still legal proceedings going on in  
10 Nigeria brought by some of the members -- the  
11 lawsuits you referred to earlier, was that  
12 still going on?  
13 A. There were several lawsuits. I don't  
14 know. I can't answer that. No.  
15 Q. Were you involved in any way in the --  
16 in the defense of those lawsuits?  
17 A. No.  
18 Q. Do you know if they're still going on  
19 today?  
20 A. Some lawsuits are going on; some are --  
21 some are lost; some are still pending. I don't  
22 know. I can't. I can't testify to that.  
23 Q. Okay. At the time you made these  
24 trademark files, P-1 and P-2, especially P-2  
25 with the U.S. Patent and Trademark Office, did

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1 you believe that the Princeton Junction, Miami,  
2 and Chicago branches were challenging this  
3 decision to dissolve the branches?  
4 Were they challenging it?  
5 A. To dissolve the branches?  
6 Q. Yes.  
7 A. They were not objecting.  
8 Q. They weren't? They weren't objecting  
9 to it?  
10 A. It has nothing to do with it. They  
11 were not challenging the dissolution of the  
12 branches.  
13 Q. They were not?  
14 A. No. I have no information about that,  
15 no.  
16 Q. So they just accepted it?  
17 A. The branches are dissolved. They're  
18 dissolved. If you want to go to Nigeria to  
19 challenge it, not challenge it in court.  
20 They -- the club owns the branches.  
21 The club had the right to remove the branches.  
22 Okay. If you -- if you quarrel with issues  
23 with the removal, the due process is you go to  
24 branches. You don't run to court. The  
25 constitution allows it. You don't run to court

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1 and challenge it. You go to -- go through your  
 2 due process. I think that's -- go to the  
 3 Central Executive Meeting and challenge it.  
 4 That's where you challenge it. You don't  
 5 challenge it in court.  
 6 I'm not aware that the branches  
 7 challenged the removal. And the lower courts,  
 8 I understand, in Nigeria have nothing to do  
 9 with being removed. It has something to do  
 10 with other things; nothing to do with the  
 11 trademark or the branches being removed.  
 12 Q. Okay. Other than the letter that you  
 13 referred to earlier, you said the letter had  
 14 been sent to everyone advising the members in  
 15 the United States that that decision had been  
 16 made in Nigeria to dissolve these three  
 17 branches. Did you ever see anything else in  
 18 writing relating to what happened in Nigeria on  
 19 the dissolution vote?  
 20 A. Yes.  
 21 Q. What did you see?  
 22 A. Minutes of the meeting.  
 23 Q. Have you produced those in this action?  
 24 A. I have them. I just got them. I had  
 25 them. I haven't produced them.

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1 Q. You haven't? You have them --  
 2 A. I have them in my possession.  
 3 Q. You have them in your possession -- the  
 4 minutes of that meeting?  
 5 A. Yes.  
 6 MR. HILLIARD: Matt, I'll make a  
 7 request for a copy of those.  
 8 MR. SWYERS: Absolutely.  
 9 MR. HILLIARD: I'll follow up with a  
 10 letter to you.  
 11 MR. SWYERS: Thank you.  
 12  
 13 INFORMATION REQUESTED:  
 14  
 15 MR. HILLIARD: Give me a minute here.  
 16 Matt, I'm just marking your production Bates  
 17 stamped 002 to 003.  
 18 MR. SWYERS: Thank you.  
 19  
 20 (Plaintiff's Exhibit Number 3, Two-page  
 21 Document, was marked for identification.)  
 22  
 23 BY MR. HILLIARD:  
 24 Q. Dr. Mgbako, you have in front of you  
 25 what's been marked as P-3 for identification on

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1 the record. And I can tell you that these are  
 2 two -- two documents that you produced to us.  
 3 It has a marking on the bottom of it -- a  
 4 number two and a number three which is a  
 5 control number that shows what documents that  
 6 you produced to us in response to our requests;  
 7 so this came from your files is my  
 8 understanding.  
 9 Do you recognize them?  
 10 A. Yes.  
 11 Q. And they at least appear to me to be  
 12 two pages that they don't belong together, in  
 13 the sense that one's not a continuation of the  
 14 other, but do you recognize the first page?  
 15 A. Yes.  
 16 Q. And what is it?  
 17 A. It's a correspondence.  
 18 Q. Is it the first page --  
 19 A. That's the first page.  
 20 Q. -- of the letter?  
 21 A. Yes.  
 22 Q. Okay. It was dated January 17, 2014?  
 23 A. Yes.  
 24 Q. Is this the letter to which you  
 25 referred to a few minutes ago in your

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1 testimony?  
 2 A. Yes.  
 3 Q. About a communication that was sent  
 4 advising of some dissolution vote on the  
 5 branches that was taken in Nigeria?  
 6 A. Yes.  
 7 Q. Do you know who drafted this letter?  
 8 Who wrote it?  
 9 A. There's a signature on page two.  
 10 Q. Chief Ilonze?  
 11 A. Yes.  
 12 Q. And Elder Ebere?  
 13 A. Yes.  
 14 Q. Okay. They wrote this document -- the  
 15 first page; correct?  
 16 A. That's their signature. They wrote it.  
 17 Q. On the top? Okay.  
 18 How did you receive this?  
 19 A. This was sent to me by email.  
 20 Q. From someone in Nigeria?  
 21 A. Yes.  
 22 Q. Okay. Did you -- were you asked to  
 23 distribute it to anyone else?  
 24 A. No.  
 25 Q. So you got your copy by email?

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1 A. I got my copy, yes.  
2 Q. And am I correct that you can't testify  
3 whether anyone else got?  
4 A. I can't.  
5 Q. You don't know whether any of the other  
6 branches received this; is that correct?  
7 A. I don't know.  
8  
9 (Pause.)  
10  
11 MR. HILLIARD: I'll be right back.  
12 You're hearing silence only because I'm  
13 looking at a couple of documents here.  
14 MR. SWYERS: That's fine.  
15 MR. HILLIARD: Let's just take three  
16 minutes, and we'll leave the line open.  
17 I'll talk outside with my client for a  
18 moment.  
19  
20 (A short break was taken.)  
21  
22 MR. HILLIARD: I have no further  
23 questions. I'm done.  
24 MR. SWYERS: All right. I have a few.  
25 Are we all right?

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1  
2 CROSS-EXAMINATION  
3 BY MR. SWYERS:  
4 Q. Doctor, I want to refer you back to the  
5 trademark application. I think it's the second  
6 -- dated April 9, 2014.  
7 MR. HILLIARD: So that's P-2.  
8 BY MR. SWYERS:  
9 Q. Do you have that in front of you?  
10 MR. HILLIARD: P-2; correct?  
11 MR. SWYERS: I believe that's correct.  
12 MR. HILLIARD: I'll put it in front of  
13 him. He has it.  
14 MR. SWYERS: Thank you.  
15 BY MR. SWYERS:  
16 Q. Now, when we went back and forth there  
17 was some confusion about whether the  
18 dissolution meeting happened in 2013 or 2014;  
19 is that correct?  
20 A. Yes.  
21 Q. Okay. And you're aware that certain  
22 certifications were made when we file a  
23 specimen with the Patent and Trademark Office  
24 regarding it being used in commerce; is that  
25 correct?

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1 A. Yes. Yes.  
2 Q. Okay. And to the best of your  
3 knowledge, you told the truth when providing  
4 the specimens to our office in that regard;  
5 correct?  
6 A. I told the truth, yes.  
7 Q. Okay. And there may be some confusion  
8 on the dates here today, but the specimen was  
9 in use as certified to the U.S. PTO, to the  
10 best of your knowledge; is that correct?  
11 A. Yes.  
12 MR. SWYERS: Okay. I actually have no  
13 further questions at this juncture.  
14 THE COURT REPORTER: We're done?  
15 MR. HILLIARD: We're done.  
16 THE COURT REPORTER: Okay. So, Mr. -- I  
17 mean, Matt, you want a copy? I don't know  
18 how it works.  
19 MR. SWYERS: We're going to actually  
20 talk to my client about it. Well, I don't  
21 mind talking about it. She's going to, you  
22 know -- we can get a copy of it. I actually  
23 would need to get a copy of it. It probably  
24 would cost you about four or five hundred  
25 dollars to do so, on average. You know, it

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1 could be a little more; it could be a little  
2 less. Even if it's not less, would you like  
3 us to order a copy? I do recommend it.  
4 THE WITNESS: I have no problems with  
5 it.  
6 MR. SWYERS: Yeah, we'll take a copy.  
7 MR. HILLIARD: Okay, Matt. We're going  
8 to disconnect.  
9 MR. SWYERS: Fair enough.  
10 MR. HILLIARD: Thanks.  
11 MR. SWYERS: Doctor, I'll call you in a  
12 few minutes.  
13 THE WITNESS: Okay. Thanks.  
14 MR. SWYERS: Thanks. Bye.  
15  
16 (Time noted: 12:55 p.m.)  
17  
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1 CERTIFICATION

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I, MARY T. SLAVIK, Court Reporter and Notary Public, do hereby certify:

That I reported the proceedings that are hereinbefore set forth, and that such transcript is a true and accurate record of said proceedings.

AND, I further certify that I am not related to any of the parties to this action by blood or marriage, and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand.

\_\_\_\_\_  
MARY T. SLAVIK, RPR  
Court Reporter

1 CERTIFICATION

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That I reported the proceedings that are hereinbefore set forth, and that such transcript is a true and accurate record of said proceedings.

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Mary T. Slavik, RPR  
Court Reporter

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PTO Form 1478 (Rev 9/2006)  
 OMB No. 0651-0009 (Exp 12/31/2014)

## Trademark/Service Mark Application, Principal Register

### TEAS Plus Application

Serial Number: 86116372

Filing Date: 11/12/2013

**NOTE: Data fields with the \* are mandatory under TEAS Plus. The wording "(if applicable)" appears where the field is only mandatory under the facts of the particular application.**

The table below presents the data as entered.

Input Field	Entered
TEAS Plus	YES
<b>MARK INFORMATION</b>	
*MARK	<u>\\TICRS\EXPORT16\IMAGEOUT 16\861\163\86116372\xml1\FTK0002.JPG</u>
*SPECIAL FORM	YES
USPTO-GENERATED IMAGE	NO
LITERAL ELEMENT	PEOPLES CLUB OF NIGERIA INTERNATIONAL
*COLOR MARK	YES
*COLOR(S) CLAIMED (If applicable)	The color(s) black, blue, red, yellow is/are claimed as a feature of the mark.
*DESCRIPTION OF THE MARK (and Color Location, if applicable)	The mark consists of the black letters PEOPLES CLUB OF NIGERIA INTERNATIONAL above a blue circle bordered in black linked to a red circle bordered in black linked to a yellow circle bordered in black.
PIXEL COUNT ACCEPTABLE	YES
PIXEL COUNT	944 x 295
REGISTER	Principal
<b>APPLICANT INFORMATION</b>	
*OWNER OF MARK	Peoples Club of Nigeria International
*STREET	16 Wright St.

*CITY	Edison
*STATE (Required for U.S. applicants)	New Jersey
*COUNTRY	United States
*ZIP/POSTAL CODE (Required for U.S. applicants only)	08820
<b>LEGAL ENTITY INFORMATION</b>	
*TYPE	association
* STATE/COUNTRY WHERE LEGALLY ORGANIZED	Nigeria
<b>GOODS AND/OR SERVICES AND BASIS INFORMATION</b>	
*INTERNATIONAL CLASS	041
*IDENTIFICATION	Social club services, namely, arranging, organizing, and hosting social events, get-togethers, and parties for club members
*FILING BASIS	SECTION 1(a)
FIRST USE ANYWHERE DATE	At least as early as 00/00/1994
FIRST USE IN COMMERCE DATE	At least as early as 00/00/1994
SPECIMEN FILE NAME(S)	
ORIGINAL PDF FILE	<u>SPE0-9767147154-131702076 . filename-1.pdf</u>
CONVERTED PDF FILE(S) (1 page)	<u>\\TICRS\EXPORT16\IMAGEOUT16\861\163\86116372\xml1\FTK0003.JPG</u>
SPECIMEN DESCRIPTION	letterhead
<b>ADDITIONAL STATEMENTS SECTION</b>	
*TRANSLATION (if applicable)	
*TRANSLITERATION (if applicable)	
*CLAIMED PRIOR REGISTRATION (if applicable)	
*CONSENT (NAME/LIKENESS)	

(if applicable)	
<b>*CONCURRENT USE CLAIM</b> (if applicable)	
<b>DISCLAIMER</b>	No claim is made to the exclusive right to use "Nigeria" apart from the mark as shown.
<b>ATTORNEY INFORMATION</b>	
<b>NAME</b>	Matthew H. Swyers, Esq.
<b>FIRM NAME</b>	The Trademark Company
<b>STREET</b>	344 Maple Ave. West, Suite 151
<b>CITY</b>	Vienna
<b>STATE</b>	Virginia
<b>COUNTRY</b>	United States
<b>ZIP/POSTAL CODE</b>	22180
<b>PHONE</b>	1-800-906-8626
<b>FAX</b>	1-877-351-5480
<b>EMAIL ADDRESS</b>	info@thetrademarkcompany.com
<b>AUTHORIZED TO COMMUNICATE VIA EMAIL</b>	Yes
<b>CORRESPONDENCE INFORMATION</b>	
<b>*NAME</b>	Matthew H. Swyers, Esq.
<b>FIRM NAME</b>	The Trademark Company
<b>*STREET</b>	344 Maple Ave. West, Suite 151
<b>*CITY</b>	Vienna
<b>*STATE</b> (Required for U.S. applicants)	Virginia
<b>*COUNTRY</b>	United States
<b>*ZIP/POSTAL CODE</b>	22180
<b>PHONE</b>	1-800-906-8626
<b>FAX</b>	1-877-351-5480
<b>*EMAIL ADDRESS</b>	info@thetrademarkcompany.com
<b>*AUTHORIZED TO COMMUNICATE VIA</b>	Yes

<b>EMAIL</b>	
<b>FEE INFORMATION</b>	
<b>NUMBER OF CLASSES</b>	1
<b>FEE PER CLASS</b>	275
<b>*TOTAL FEE PAID</b>	275
<b>SIGNATURE INFORMATION</b>	
<b>* SIGNATURE</b>	/Matthew H. Swyers/
<b>* SIGNATORY'S NAME</b>	Matthew H. Swyers
<b>* SIGNATORY'S POSITION</b>	Attorney of Record
<b>SIGNATORY'S PHONE NUMBER</b>	1-800-906-8626
<b>* DATE SIGNED</b>	11/12/2013

## Trademark/Service Mark Application, Principal Register

### TEAS Plus Application

**Serial Number: 86116372**

**Filing Date: 11/12/2013**

#### To the Commissioner for Trademarks:

**MARK:** PEOPLES CLUB OF NIGERIA INTERNATIONAL (stylized and/or with design, see mark)

The literal element of the mark consists of PEOPLES CLUB OF NIGERIA INTERNATIONAL. The color(s) black, blue, red, yellow is/are claimed as a feature of the mark. The mark consists of the black letters PEOPLES CLUB OF NIGERIA INTERNATIONAL above a blue circle bordered in black linked to a red circle bordered in black linked to a yellow circle bordered in black.

The applicant, Peoples Club of Nigeria International, a association legally organized under the laws of Nigeria, having an address of

16 Wright St.  
Edison, New Jersey 08820  
United States

requests registration of the trademark/service mark identified above in the United States Patent and Trademark Office on the Principal Register established by the Act of July 5, 1946 (15 U.S.C. Section 1051 et seq.), as amended, for the following:

**For specific filing basis information for each item, you must view the display within the Input Table.**

International Class 041: Social club services, namely, arranging, organizing, and hosting social events, get-togethers, and parties for club members

In International Class 041, the mark was first used by the applicant or the applicant's related company or licensee predecessor in interest at least as early as 00/00/1994, and first used in commerce at least as early as 00/00/1994, and is now in use in such commerce. The applicant is submitting one(or more) specimen(s) showing the mark as used in commerce on or in connection with any item in the class of listed goods and/or services, consisting of a(n) letterhead.

**Original PDF file:**

[SPE0-9767147154-131702076 . filename-1.pdf](#)

**Converted PDF file(s) (1 page)**

[Specimen File1](#)

No claim is made to the exclusive right to use "Nigeria" apart from the mark as shown.

The applicant's current Attorney Information:

Matthew H. Swyers, Esq. of The Trademark Company  
344 Maple Ave. West, Suite 151  
Vienna, Virginia 22180  
United States

The applicant's current Correspondence Information:

Matthew H. Swyers, Esq.  
The Trademark Company  
344 Maple Ave. West, Suite 151  
Vienna, Virginia 22180  
1-800-906-8626(phone)  
1-877-351-5480(fax)  
info@thetrademarkcompany.com (authorized)

A fee payment in the amount of \$275 has been submitted with the application, representing payment for 1 class(es).

**Declaration**

The undersigned, being hereby warned that willful false statements and the like so made are punishable by fine or imprisonment, or both, under 18 U.S.C. Section 1001, and that such willful false statements, and the like, may jeopardize the validity of the application or any resulting registration, declares that he/she is properly authorized to execute this application on behalf of the applicant; he/she believes the applicant to be the owner of the trademark/service mark sought to be registered, or, if the application is being filed under 15 U.S.C. Section 1051(b), he/she believes applicant to be entitled to use such mark in commerce; to the best of his/her knowledge and belief no other person, firm, corporation, or association has the right to use the mark in commerce, either in the identical form thereof or in such near resemblance thereto as to be likely, when used on or in connection with the goods/services of such other person, to cause confusion, or to cause mistake, or to deceive; and that all statements made of his/her own knowledge are true; and that all statements made on information and belief are believed to be true.

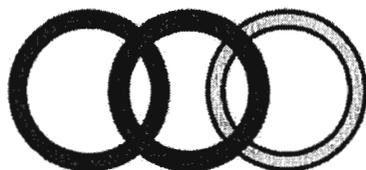
Signature: /Matthew H. Swyers/ Date Signed: 11/12/2013  
Signatory's Name: Matthew H. Swyers  
Signatory's Position: Attorney of Record

RAM Sale Number: 86116372  
RAM Accounting Date: 11/12/2013

Serial Number: 86116372  
Internet Transmission Date: Tue Nov 12 13:30:59 EST 2013

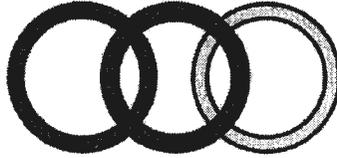
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-CC-21819-20131112131702076350

# **PEOPLES CLUB OF NIGERIA INTERNATIONAL**



# PEOPLES CLUB OF NIGERIA INTERNATIONAL

REGISTERED IN NIGERIA  
REGISTERED IN UNITED STATES  
REGISTERED IN UNITED KINGDOM  
REGISTERED IN CANADA



## USA Address

16 Wright Street  
Edison, NJ 08820

Chief F.A. Onwuachu  
Chairman, Management Committee  
Ichie P.D.C. Okechukwu  
General Secretary, Management Committee

## Headquarters

Onitsha/Owerri Road  
P.O. Box 5421  
Onitsha, Anambra State  
NIGERIA

## USA Branches

Houston  
Washington, DC  
Miami  
Princeton  
Galveston  
Dallas/Fort Worth  
Boston  
Philadelphia  
Atlanta  
New York  
Cherry Hill  
San Francisco  
Princeton Junction  
Chicago  
Arlington  
New Haven  
Los Angeles  
San Antonio  
Virginia Beach  
Austin Texas

## Canada

Toronto Branch

## United Kingdom

London Branch

*Infor The Trademark Company.com  
ATTN: NEW MARK DESIGN*

Governing Council: HRH Igwe P.C. Ezenwa, Chairman



## Response to Office Action

The table below presents the data as entered.

Input Field	Entered
<b>SERIAL NUMBER</b>	86116372
<b>LAW OFFICE ASSIGNED</b>	LAW OFFICE 109
<b>MARK SECTION (no change)</b>	
<b>LEGAL ENTITY SECTION (current)</b>	
<b>TYPE</b>	association
<b>STATE/COUNTRY WHERE LEGALLY ORGANIZED</b>	NG
<b>LEGAL ENTITY SECTION (proposed)</b>	
<b>TYPE</b>	corporation
<b>STATE/COUNTRY OF INCORPORATION</b>	Nigeria
<b>GOODS AND/OR SERVICES SECTION (current)</b>	
<b>INTERNATIONAL CLASS</b>	041
<b>DESCRIPTION</b>	
Social club services, namely, arranging, organizing, and hosting social events, get-togethers, and parties for club members	
<b>FILING BASIS</b>	Section 1(a)
<b>FIRST USE ANYWHERE DATE</b>	At least as early as 00/00/1994
<b>FIRST USE IN COMMERCE DATE</b>	At least as early as 00/00/1994
<b>GOODS AND/OR SERVICES SECTION (proposed)</b>	
<b>INTERNATIONAL CLASS</b>	041
<b>DESCRIPTION</b>	
Social club services, namely, arranging, organizing, and hosting social events, get-togethers, and parties for club members	
<b>FILING BASIS</b>	Section 1(a)
<b>FIRST USE ANYWHERE DATE</b>	At least as early as 00/00/1994
<b>FIRST USE IN COMMERCE DATE</b>	At least as early as 00/00/1994

STATEMENT TYPE	"The substitute (or new, if appropriate) specimen(s) was/were in use in commerce at least as early as the filing date of the application" [for an application based on Section 1(a), Use in Commerce] OR "The substitute (or new, if appropriate) specimen(s) was/were in use in commerce prior either to the filing of the Amendment to Allege Use or expiration of the filing deadline for filing a Statement of Use" [for an application based on Section 1(b) Intent-to-Use].
SPECIMEN FILE NAME(S)	\\TICRS\EXPORT16\IMAGEOUT 16\861\163\86116372\xml6\ ROA0002.JPG
SPECIMEN DESCRIPTION	Flier advertising club
<b>ADDITIONAL STATEMENTS SECTION</b>	
DISCLAIMER	No claim is made to the exclusive right to use CLUB OF NIGERIA INTERNATIONAL apart from the mark as shown.
<b>SIGNATURE SECTION</b>	
DECLARATION SIGNATURE	/Matthew H. Swyers/
SIGNATORY'S NAME	Matthew H. Swyers
SIGNATORY'S POSITION	Attorney of Record
SIGNATORY'S PHONE NUMBER	800-906-8626 x100
DATE SIGNED	04/09/2014
RESPONSE SIGNATURE	/Matthew H. Swyers/
SIGNATORY'S NAME	Matthew H. Swyers
SIGNATORY'S POSITION	Attorney of Record
SIGNATORY'S PHONE NUMBER	800-906-8626 x100
DATE SIGNED	04/09/2014
AUTHORIZED SIGNATORY	YES
<b>FILING INFORMATION SECTION</b>	
SUBMIT DATE	Wed Apr 09 15:13:46 EDT 2014
TEAS STAMP	USPTO/ROA-97.67.147.154-2 0140409151346993964-86116 372-50078b2aafcda15404828 5f90e0a9aa26be0ce2d749d8b 0212a8aab199f2264d8-N/A-N /A-20140409150801932050

**Response to Office Action**  
**To the Commissioner for Trademarks:**

Application serial no. **86116372** has been amended as follows:

**CLASSIFICATION AND LISTING OF GOODS/SERVICES**

**Applicant proposes to amend the following class of goods/services in the application:**

**Current:** Class 041 for Social club services, namely, arranging, organizing, and hosting social events, get-togethers, and parties for club members

Original Filing Basis:

**Filing Basis: Section 1(a), Use in Commerce:** The applicant is using the mark in commerce, or the applicant's related company or licensee is using the mark in commerce, on or in connection with the identified goods and/or services. 15 U.S.C. Section 1051(a), as amended. The mark was first used at least as early as 00/00/1994 and first used in commerce at least as early as 00/00/1994, and is now in use in such commerce.

**Proposed:** Class 041 for Social club services, namely, arranging, organizing, and hosting social events, get-togethers, and parties for club members

**Filing Basis: Section 1(a), Use in Commerce:** The applicant is using the mark in commerce, or the applicant's related company or licensee is using the mark in commerce, on or in connection with the identified goods and/or services. 15 U.S.C. Section 1051(a), as amended. The mark was first used at least as early as 00/00/1994 and first used in commerce at least as early as 00/00/1994, and is now in use in such commerce.

Applicant hereby submits one(or more) specimen(s) for Class 041. The specimen(s) submitted consists of Flier advertising club.

**"The substitute (or new, if appropriate) specimen(s) was/were in use in commerce at least as early as the filing date of the application" [for an application based on Section 1(a), Use in Commerce] OR "The substitute (or new, if appropriate) specimen(s) was/were in use in commerce prior either to the filing of the Amendment to Allege Use or expiration of the filing deadline for filing a Statement of Use" [for an application based on Section 1(b) Intent-to-Use].**

Specimen File1

**APPLICANT AND/OR ENTITY INFORMATION**

**Applicant proposes to amend the following:**

**Current:** Peoples Club of Nigeria International a(n) association, legally organized under the laws of NG, having an address of

16 Wright St.  
Edison, New Jersey 08820  
United States

**Proposed:** Peoples Club of Nigeria International, a corporation of Nigeria, having an address of  
16 Wright St.

Edison, New Jersey 08820  
United States

**ADDITIONAL STATEMENTS**

**Disclaimer**

No claim is made to the exclusive right to use CLUB OF NIGERIA INTERNATIONAL apart from the mark as shown.

**SIGNATURE(S)**

**Declaration Signature**

DECLARATION: The signatory being warned that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. Section 1001, and that such willful false statements and the like may jeopardize the validity of the application or submission or any registration resulting therefrom, declares that, if the applicant submitted the application or amendment to allege use (AAU) unsigned, all statements in the application or AAU and this submission based on the signatory's own knowledge are true, and all statements in the application or AAU and this submission made on information and belief are believed to be true.

STATEMENTS FOR UNSIGNED SECTION 1(a) APPLICATION/AAU: If the applicant filed an unsigned application under 15 U.S.C. Section 1051(a) or AAU under 15 U.S.C. Section 1051(c), the signatory additionally believes that: the applicant is the owner of the trademark/service mark sought to be registered; the applicant or the applicant's related company or licensee is using the mark in commerce and has been using the mark in commerce as of the filing date of the application or AAU on or in connection with the goods/services in the application or AAU, and such use by the applicant's related company or licensee inures to the benefit of the applicant; the original specimen(s), if applicable, shows the mark in use in commerce as of the filing date of the application or AAU on or in connection with the goods/services in the application or AAU; and to the best of the signatory's knowledge and belief, no other person has the right to use the mark in commerce, either in the identical form or in such near resemblance as to be likely, when used on or in connection with the goods/services of such other person, to cause confusion or mistake, or to deceive.

STATEMENTS FOR UNSIGNED SECTION 1(b)/SECTION 44 APPLICATION: If the applicant filed an unsigned application under 15 U.S.C. Section 1051(b), Section 1126(d), and/or Section 1126(e), the signatory additionally believes that: the applicant is entitled to use the mark in commerce; the applicant has a bona fide intention and has had a bona fide intention as of the application filing date to use or use through the applicant's related company or licensee the mark in commerce on or in connection with the goods/services in the application; and to the best of the signatory's knowledge and belief, no other person has the right to use the mark in commerce, either in the identical form or in such near resemblance as to be likely, when used on or in connection with the goods/services of such other person, to cause confusion or mistake, or to deceive.

Signature: /Matthew H. Swyers/ Date: 04/09/2014  
Signatory's Name: Matthew H. Swyers  
Signatory's Position: Attorney of Record  
Signatory's Phone Number: 800-906-8626 x100

**Response Signature**

Signature: /Matthew H. Swyers/ Date: 04/09/2014

Signatory's Name: Matthew H. Swyers  
Signatory's Position: Attorney of Record

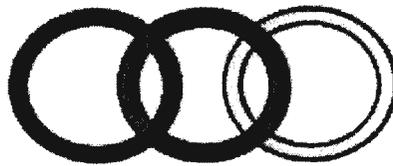
Signatory's Phone Number: 800-906-8626 x100

The signatory has confirmed that he/she is an attorney who is a member in good standing of the bar of the highest court of a U.S. state, which includes the District of Columbia, Puerto Rico, and other federal territories and possessions; and he/she is currently the applicant's attorney or an associate thereof; and to the best of his/her knowledge, if prior to his/her appointment another U.S. attorney or a Canadian attorney/agent not currently associated with his/her company/firm previously represented the applicant in this matter: (1) the applicant has filed or is concurrently filing a signed revocation of or substitute power of attorney with the USPTO; (2) the USPTO has granted the request of the prior representative to withdraw; (3) the applicant has filed a power of attorney appointing him/her in this matter; or (4) the applicant's appointed U.S. attorney or Canadian attorney/agent has filed a power of attorney appointing him/her as an associate attorney in this matter.

Serial Number: 86116372  
Internet Transmission Date: Wed Apr 09 15:13:46 EDT 2014  
TEAS Stamp: USPTO/ROA-97.67.147.154-2014040915134699  
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N/A-N/A-20140409150801932050

# PEOPLES CLUB OF NIGERIA INTERNATIONAL

USA Address  
16 Wright Street  
Edison, NJ 08820



Headquarters  
Onitsha/Owerri Road  
P.O. Box 5421  
Onitsha, Anambra State  
NIGERIA

USA Branches

Houston  
Washington, DC  
Princeton  
Galveston  
Dallas/ Fort Worth  
Boston  
Philadelphia  
Atlanta  
New York  
Cherry Hill  
San Francisco  
Arlington  
New Haven  
Los Angeles  
San Antonio  
Virginia Beach  
Austin Texas

*Motto : Unity, Love, Service  
A Social Club*

**PLAINTIFF'S EXHIBIT**  
 P-3  
 6-1075 ms

consequences.

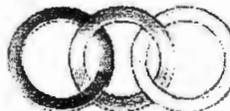
  
 Chief (Sir) J.I. Ilonze  
 President P.C.N.I.

  
 Hon. (Elder) Smart O. Ebere  
 General Secretary P.C.N.I.

2 of 2

# PEOPLES CLUB OF NIGERIA/INTERNATIONAL

**BANKERS:**  
 PNC Bank  
 Zenith Bank of Nigeria Plc.



MOTTO: UNITY, LOVE & SERVICE

**NIGERIA/INTERNATIONAL HEADQUARTERS:**  
 Onitsha/Owerri Road,  
 P.O. Box 5421  
 Onitsha, Anambra State,  
 Tel: 08037080187, 08066728872  
 E-mail: peopleclubofnigeria@yahoo.com  
 Website: www.peoplesclubofnigeria.com

Our Ref: \_\_\_\_\_ Your Ref: \_\_\_\_\_ Date: \_\_\_\_\_

17<sup>th</sup> January, 2014

**NATIONAL/INTERNATIONAL OFFICERS**

- President  
Chief Sir J. I. Ilonze
- 1st Vice President  
Chief Orykash O. Oduro
- 2nd Vice President  
Chief R. O. C. Ekeobuna
- 3rd Vice President  
Chief Sam Inagwa
- National Secretary  
Elder Smart O. Ebere
- 1st Assistant National Sec  
Chief C. C. Ekechere
- 2nd Assistant National Sec.  
Lulu Dada A., MFR
- Financial Secretary  
Chief Phileas Ogunfemi
- Legal Adviser  
Chief F. O. Oyejide
- Assistant Legal Adviser  
San Okoye Alen
- Publicity Secretary  
Chief J. O. W. Oyejide
- Assistant Publicity Sec.  
Prof. Emma Osofa

To: All Members of P.C.N.I  
 All Branch of P.C.N.I. World  
 Chicago Branch of P.C.N.I  
 Miami Branch of P.C.N.I  
 Princeton Junction Branch of P.C.N.I  
 San-Antonio Branch of P.C.N.I

Final Dissolution and withdrawal of charter of Chicago, Miami and Princeton Junction Branches of P.C.N.I

Further to the decision of Central Executive Committee (C.E.C.) on 20<sup>th</sup> July, 2013 at Dallas Forth-Worth and letters of 7<sup>th</sup> September, 2013; dissolving the executive committee of Chicago, Miami and Princeton Junction branches pending the review of their status and re-constitution of new executives, the Club at its Annual General Meeting (AGM) held at its International Headquarters, Onitsha on 20<sup>th</sup> December, 2013, unanimously resolved as follows:

- (i) To close down Chicago, Miami and Princeton Junction completely and withdraw and or cancel the Club's charter for

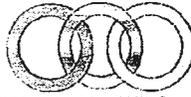
*Dissolved*

600002

# PEOPLES CLUB OF NIGERIA/INTERNATIONAL

CACIT/No. 1299  
Registered in Nigeria.

**BANKERS:**  
PNC Bank  
Zenith Bank of Nigeria Plc.



MISSION: UNITY, LOVE & SERVICE

US Serial No. 89116372  
Registered in United States.  
NIGERIA/INTERNATIONAL HEADQUARTERS:  
Onitsha / Owerri Road,  
P.O. Box 5421  
Onitsha, Anambra State,  
Tel: 08037089187, 08086728872.  
E-mail: peoplesclubofnigeria@yahoo.com  
Website: www.peoplesclubofnigeria.com

Our Ref:

Your Ref:

Date: 25/10/2014

MEMBER INFORMATION  
08066728872

- President  
CHIEF SIR J. I. ILONZE
- 1st Vice President  
CHIEF ONYEKACHO O. OKORO
- 2nd Vice President  
CHIEF R. O. C. EKEDOZIE
- 3rd Vice President  
CHIEF SAM NWGWWE
- National Secretary  
ELDER SUART O. EBERE
- 1st Assistant National Sec.  
CHIEF G. C. NIOJERWU
- 2nd Assistant National Sec.  
LADY DORIS AHYADOR
- Financial Secretary  
CHIEF PAULINUS ONYEHUFORO
- National Treasurer  
CHIEF SIR DR. A. E. OKEKE
- Legal Adviser  
CHIEF F. O. ONYEBUEKE
- Assistant Legal Adviser  
ANTHONY OFILI EGBUSI (KSR)
- 2nd Assistant Legal Adviser  
BARR. OKAY AKPOJI
- Publicity Secretary  
CAPT. J. O. NI ONYEMA
- Assistant P. Mchry Sec.  
PROF. EMMA OPARA
- Protocol Officer  
CHIEF ALYAN OKOYE
- Assistant Protocol Officer  
HON. BON IBERIYE
- Welfare Officer  
CHIEF GOODY ORAHEDO
- Assistant Welfare Officer  
LADY RUBY UNADI
- 2nd Assistant Welfare Officer  
IZZE BON KWUAGYU
- 3rd Assistant Welfare Officer  
BRO. GODWIN ADENIJE
- 4th Assistant Welfare  
CHIEF S. O. IGBOALIAEZE
- House Master  
CHIEF LARUTH EZEIKE
- Assistant House Master  
CHIEF ERNEST O. UGORJI
- 2nd Assistant House Master  
HON. VICTOR MUEDE
- 3rd Assistant House Master  
HON. ANJANE OKEKE

To:  
Patron Iddi Mgbako  
No. 16 Wright  
St Edison  
NJ 08820

Sir

## INFORMATION ABOUT PEOPLES CLUB OF NIGERIA

Peoples Club of Nigeria International is a social Club registered in Nigeria with branches in Nigeria, Canada, United Kingdom, and United States of America. Each branch is organized under a Charter granted by PCNI authorities in Nigeria. When a charter is withdrawn such a branch ceases to exist regardless of their registration status where they operate. The Club has the right to dissolve offending executives and appoint caretaker committees when appropriate.

The Peoples Club of Nigeria International New Jersey is a subsidiary of Peoples Club of Nigeria International registered in Nigeria. The Peoples Club of Nigeria International New Jersey operates under the constitution of Peoples Club of Nigeria registered in Nigeria. The branches of Peoples Club in the USA report directly to the authorities in Nigeria.

Patron Dr. Ambrose Mgbako is the current appointed agent of PCNI New Jersey and authorized to apply, obtain, monitor and prosecute any violation of Peoples Club of Nigeria International Trademark.

Chief (Dr) Sir J.I. Ilonze  
President PCNI

Hon. Elder Smart O. Ebere  
National Secretary PCNI

TRUSTEES: HRM Igwe P. C. Ezenwa, Chief J. O. Igwe, Chief E. N. Odifinye, Chief I. Ojukwu Ike,  
HRM Igwe R. N. Nwankevo, Chief J. C. Okafor, Chief F. H. Okekeazu  
Address all correspondence to the General Secretary  
honsmariebere@gmail.com (08066728872)

INTERROGATORY NO. 6



**History of Peoples Club of Nigeria International (PCNI)**

The People's Club of Nigeria was founded by Nigerians who are impelled by the desire to foster good relations amongst members and to sponsor and promote charitable and philanthropic causes. Peoples club was formed in 1971 in Abe (Abe state of Nigeria) by a small group of individuals led by Chief Tolu I. Ume-Esoaka. This was at a period of hopelessness following the devastation of the Nigeria civil war which ended in 1970. The Club was formed with the spirit of uniting people of like-minds, for social interaction. The formation was timely and extensively welcomed because of the Club's founding purpose which reads "be your brother's keeper" and was also embodied in it's motto: Unity, love and Service. Since the formation, the Club has grown extensively. BY the year 2000, there was a branch of Peoples Club in every major city in Nigeria. Peoples Club headquarters is located in Onitsha, Anambra State of Nigeria. Peoples Club is often imitated but seldom duplicated. Since 1971, there have been other clubs who do compete with Peoples Club, but could not compete. This is why Peoples Club is a privilege to belong. Membership is open to all irrespective of race, religion or tribe. The Club is non political.

The Motto of the Club is Reflected in PCNI Ring

**NON-PLAN NEWS**

- [Odi.Net](#)
- [Nigerian News](#)
- [Guardian News](#)
- [Nigerian Daily](#)
- [TheCity Online](#)
- [BBC News](#)
- [African Events](#)
- [Nigerian Videos - Online Nigeria](#)
- [African Music Movies](#)
- [Nollywood - Free Nigerian Movies](#)
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[PCNI Links](#)

- [National Officers](#)
- [AGM Reports](#)
- [PCNI Video](#)
- [PCNI Music](#)

**PEOPLES CLUB ANTHEM**

Peoples Club Bu Ndi Eziabo Onumoi  
 Peoples Club Bu Ndi Eziabo Onumoi Na  
 Nigeria O'O 'O Odogwu O'O  
 Omaku Ka Odoaku 'O  
 Fa Kwerefi Eberesi  
 Ala Unu Di Uzo  
 Ezi Ala Ka Ego  
 Odi Ofala; Anelwedebe  
 Peoples Club Odogwu  
 Igiigi Adagbu Kwe Na Anyi 'O 'O  
 Igiigi Adagbu Kwe Na Anyi O O Ika Odi Di O  
 Igiigi Ada Gbu Kwe Na Anyi O  
 Odi Ofala; Anelwedebe

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Patron Nze (Dr) Sir Vincent and Loto Victoria Nwabube's Patron celebration in Houston Texas on November 19-23, 2014 was fantastic and an event to remember. It was filled with activities and fun. Dignitaries came from Nigeria, the United Kingdom, Canada, the United States of America etc. Click on this link to view the gallery of photos. Enjoy!!!  
[Click here to view the photo gallery.](#)

Take a glance at the Philadelphia Induction ceremony. dignitaries travelled for Nigeria, the United Kingdom, Canada, the United States of America to grace the occasion. Click on this link to view the pictures. Enjoy!!!  
[Click here to view the photo gallery.](#)

**PCNI PHILADELPHIA 2014 INDUCTION**  
 Click on this link to view the gallery of photos. Enjoy!!!  
[Click here to view the photo gallery.](#)

**PCNI HQ ONITSHA NIGERIA**

The famous and prestigious Eze Okpoko, Father, Patron and Trustee of Peoples Club of Nigeria International poses for the camera at the AGM meeting in Onitsha December 2013

Peoples Club of Nigeria International, AGM meeting Onitsha Nigeria 2013.[more](#)

**LOCAL BRANCHES**

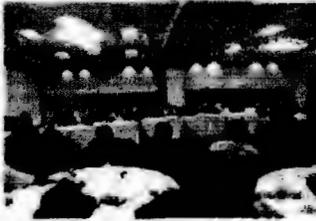
- [Houston Branch](#)
- [Washington DC Branch](#)
- [Miami Branch](#)
- [Galveston Branch](#)
- [Princeton Branch](#)
- [Dallas Branch](#)
- [Boston Branch](#)
- [Philadelphia Branch](#)
- [Toronto Branch](#)
- [Atlanta Branch](#)
- [New York Branch](#)
- [Cherry Hill Branch](#)
- [San Francisco Branch](#)
- [Princeton Junction Branch](#)
- [Chicago Branch](#)
- [Arlington Branch](#)
- [New Haven Branch](#)
- [Los Angeles Branch](#)
- [San Antonio Branch](#)
- [Virginia Beach Branch](#)
- [Austin Branch](#)

« April 2015 »						
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	1	2	3	4		
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30					

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**ANNOUNCEMENTS**





HRM Igwe (Dr) Arinze addresses members of the Central Executive Council (CEC) in Philadelphia



MEET YOUR PATRONS  
Houston Delegates at Atlanta Induction 2014  
Snap Shots

Hon Chairman Ochiagha and his Beautiful Wife of New York Branch



Atlanta Branch 2014 Induction Ceremony 2014



Produced by Professor Emmanuel Opara  
Asst. National Public Relations Officer and Director of Communications  
Club and Events

Patron Ambrose Iddi Mgbako, MD and Lolo (Lady) Mgbako



Patron Professor Innocent and Lolo Aluku



Hon Chief (Mrs.) Nkachi Iroku - Slimfit Omerigbo I Eniwawane, Hon Chairwoman of Cherry Hill Branch

Peoples Club Protocol is what separates the club from every other organization. That's what gives members the dignity and sense of belongingness while elevating the club above all other organization. Everything about the club follows a certain formality and etiquette. Peoples Club membership is all about respect, recognition for each other and adherence to a strict code of social ethics and decorum. Peoples Club is about class, elegance and nobility. It is a privilege to belong and this is why many are called but a few are chosen. From the pageantry and ovation of simple entrance of members, to sitting arrangements, to the way they talk and when they talk, Peoples Club members exude enthusiasm, orderliness and discipline. They have a superior sense of hierarchy, procedure and show of excellence. In Peoples club there is no hurry. It must be done right. It is a matter the protocol — the Peoples Club way!!

[If you have any questions and concerns please contact Professor Emmanuel Uzoma Opara by clicking here.](#)



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**Officers**

**AGM Report**

**PCNI Videos**

**Nigerian News**

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**PCNI Anthem**

**Mini Calendar**

Mar 2015						
Su	Mo	Tu	We	Th	Fr	Sa
1	2	3	4	5	6	7
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22	23	24	25	26	27	28
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Today

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**About Peoples Club of Nigeria International**

Peoples club was formed in 1971 in Aba (Aba state of Nigeria) by a small group of individuals led by Chief Titus I. Ume-Ezeoke of blessed memory. It was a period of hopelessness following the devastation of the Nigeria civil war which ended in 1970. It was formed with the spirit of uniting people of like-minds, for social interaction. It was timely and it was well received because of its founding principle of "be your brother's Keeper" embodied in its motto: unity, love & Service Continue Reading >>>>>



**CHIEF DR EZE CELEBRATES PCNI PATRONSHIP IN STYLE**



**PCNI News and Information**

- [Chief Austin Ilodibe die... \(2008/1/28\)](#)
- [Oliver De Coque is dead! \(2008/1/24\)](#)
- [Chief Stephen Osita Osadi... \(2007/5/20\)](#)



PCNI Up Coming Events calendar  
No Events

**Members Login**

**Spotlight**



**PCNI DISCUSSION**



**YOUNG PEOPLE GROUP REGISTERS AND JOIN**

**PCNI MEMBERS ONLY**

**Asaba Convention 19... (2011/1/31)**



**Asaba Convention 19... (2011/1/23)**



**AGM 2010 (2011/1/23)**



**AGM 2010 (2011/1/23)**



**AGM 2010 (2011/1/23)**

**PCNI World - Wide Branches**  
 CLICK ON A BRANCH TO VISIT THEIR WEB SITE



**PCNI Nigerian Links**

- [Nollywood Secrets](#) (559)
- [Go Naira](#) (488)
- [Nigerian Net](#) (441)
- [hostmaker.net](#) (321)
- [Nigerian Events](#) (307)



**Current Job Listings**

[View all Job Listings.](#)  
[PCNI Business Listings](#)

- [Host maker Inc](#) (2011/1/24)

**Top Classifieds Listings**

**Polls**

**How do you like our new website?**

- Excellent!
- Cool
- Hmm...not bad
- What the hell is this?

**Vote! Results**

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