

ESTTA Tracking number: **ESTTA746262**

Filing date: **05/13/2016**

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

Proceeding	92059944
Party	Plaintiff 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
Correspondence Address	CRAIG S HILLARD STARK & STARK PC 993 LENOX DRIVE, BLDG 2 LAWRENCEVILLE, NJ 08648 UNITED STATES chilliard@stark-stark.com, eparks@stark-stark.com
Submission	Other Motions/Papers
Filer's Name	Craig Hilliard
Filer's e-mail	chilliard@stark-stark.com, gmarkin@stark-stark.com, eparks@stark-stark.com
Signature	/Craig S. Hilliard/
Date	05/13/2016
Attachments	Notice of Filing of Certified Transcripts 05-13-16.pdf(15724 bytes ) Transcript - Mgbako.Ambrose.certified 12-02-15.pdf(826996 bytes ) P 01.pdf(792302 bytes ) P 02.pdf(592381 bytes ) P 03.pdf(616779 bytes ) P 04.pdf(1094979 bytes ) P 05.pdf(1504148 bytes ) P 06.pdf(1362102 bytes ) P 07.pdf(1128289 bytes ) P 10.pdf(2299815 bytes ) P 17.pdf(588374 bytes ) P 18.pdf(558046 bytes ) P 19.pdf(2140253 bytes ) P 20.pdf(757603 bytes ) P 21.pdf(899110 bytes ) P 23.pdf(784997 bytes ) Exhibit 01.pdf(2687581 bytes ) Exhibit 02.pdf(1178814 bytes ) Exhibit 03.pdf(1013930 bytes ) Exhibit 04.pdf(688466 bytes ) Exhibit 05.pdf(565576 bytes ) Exhibit 08.pdf(624938 bytes ) Errata Sheet - Mgbako.pdf(85847 bytes )

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  
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.

**Cancellation No.: 92059944**

**NOTICE OF FILING OF CERTIFIED TRANSCRIPTS  
OF TRIAL TESTIMONY WITH SUPPORTING EXHIBITS**

Petitioners Peoples Club of Nigeria International (“PCNI”) Princeton Junction branch, Chicago branch and Miami branch (collectively the “Petitioners”) pursuant to Trademark Rules 2.123 and 2.125, hereby submits copies of the following certified transcripts of trial testimony, along with all exhibits attached thereto, for filing in the above referenced proceeding:

- |     |                         |                   |
|-----|-------------------------|-------------------|
| (1) | Ambrose O. Mgbako, M.D. | December 2, 2015  |
| (2) | Gordian Ndubizu         | December 8, 2015  |
| (3) | Anayo Ukeje, Ph.D.      | December 11, 2015 |

These materials are being sent by overnight courier addressed as follows:

United States Patent and Trademark Office  
Trademark Trial and Appeal Board  
Post Office Box 1451  
Alexandria, Virginia 22313-1451

A copy of the certified transcripts, exhibits and errata sheets have been filed with the Board via its electronic filing system. As required by the rules, a copy of this Notice is being provided to Registrant, Peoples Club of Nigeria International. A copy of the transcripts, exhibits and errata sheets were previously forwarded to counsel for Registrant.

Respectfully submitted,

**STARK & STARK**  
A Professional Corporation

By: s/Craig S. Hilliard  
CRAIG S. HILLIARD

Dated: May 13, 2016

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that I have, on this 13<sup>th</sup> day of May 2016, delivered a true and accurate copy of the Notice of Electronic Filing of Certified Transcripts of Trial Testimony with Supporting Exhibits, via electronic mail to the following:

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

**STARK & STARK**  
A Professional Corporation

By: s/Craig S. Hilliard  
CRAIG S. HILLIARD

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

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 Corporatio:,  
Registrant. :

- - -

December 2, 2015

- - -

Oral sworn deposition of  
AMBROSE O. MGBAKO, M.D., held at the law  
offices of Stark & Stark, P.C., 993 Lenox  
Drive, Building 2, 2nd Floor, Lawrenceville,  
New Jersey, commencing on or about 10:00  
a.m., before Heather L. Ashton-Chee Wah,  
Notary Public and Certified Court Reporter of  
the State of New Jersey.

- - -

MAGNA LEGAL SERVICES  
(866) 624-6221  
www.MagnaLS.com

- - -



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

A P P E A R A N C E S:

STARK & STARK, P.C.  
BY: H. MATTHEW TAYLOR, ESQUIRE  
993 Lenox Drive, Building 2  
3rd Floor  
Lawrenceville, NJ 08648  
609.896.9060  
mtaylor@stark-stark.com  
Counsel for the Petitioners

VIA TELEPHONE:  
THE TRADEMARK COMPANY  
BY: MATTHEW H. SWYERS, ESQUIRE  
344 Maple Avenue West  
Suite 151  
Vienna, Virginia 22180  
800.906.8626 - Ext. 100  
mswyers@thetrademarkcompany.com  
Counsel for the Registrant

ALSO PRESENT:  
  
-Gordian Ndbubizu

- - -

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

W I T N E S S I N D E X

Examination of Dr. Mgbako by Mr. Taylor  
pages 7, 98

Examination of Dr. Mgbako by Mr. Swyers  
page 79

- - -

E X H I B I T S

\*The following exhibits were pre-marked by Mr. Taylor:

Exhibit P-1: TEAS Plus Application

Exhibit P-2: Response to Office Action

Exhibit P-3: State of New Jersey Department  
Of the Treasury Filing  
Certification (Certified Copy)

Exhibit P-4: Division of Commercial  
Recording Certificate of  
Incorporation, Nonprofit

Exhibit P-5: 7/16/14 2pg. Letter

Exhibit P-6: 7/16/14 1pg. Letter

Exhibit P-7: Peoples Club of  
Nigeria/International Letterheads

Exhibit P-10: Peoples Club of Nigeria  
International (PCNI) Current  
Happenings ORLU Branch View

Exhibit P-17: Peoples Club of Nigeria  
International Acknowledgement of  
The Receipt of the Sum  
Of \$5,000.00

Exhibit P-18: 8/23/10 Letter with Check #130

Exhibit P-19: People's Club Constitution  
Bye-Laws and Standing Orders

Exhibit P-20: 9/25/12 1pg. Letter

Exhibit P-21: 5/5/15 Letter

Exhibit P-23: 10/31/06 Letter

E X H I B I T S

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

\*The following Exhibits were pre-marked by  
Mr. Swyers:

Exhibit 1: Peoples Club of Nigeria Document  
Bates-stamped 000030 through 000033

Exhibit 2: The Three Rings Document  
Bates-stamped 000027

Exhibit 3: The Three Rings Document  
Bates-stamped 000028

Exhibit 4: 25/10/14 1pg. Letter

Exhibit 5: 7/14/14 1pg. Letter

Exhibit 8: 2/18/15 Public Notice and Warning  
Regarding the violation of the  
Trademark of People's Club of  
Nigeria International by the  
Dissolved Chicago Branch

- - -

R E Q U E S T S

- 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

BY MR. TAYLOR:

PAGE

LINE

64

2

- - -



1 we're in an informal setting today we're  
2 sitting here in an office building in a -- in  
3 a conference room. That has the same effect  
4 as if you were in the courtroom before a  
5 judge.

6 So do you understand that?

7 A. I do.

8 Q. So you're under an obligation to --  
9 to tell the truth in all the questions that I  
10 ask you.

11 Understand that?

12 A. I do.

13 Q. Okay. So, just generally, the way  
14 this is going to go is I'm going to ask a  
15 question, and in response you need to  
16 verbalize an answer so that the court  
17 reporter can take down an answer. In other  
18 words, gestures, head nodding, that kind of  
19 stuff doesn't really help, because we're  
20 going to have a transcript of the proceeding.

21 Do you understand that?

22 A. I do.

23 Q. Okay. And if I ask a question that  
24 is unclear in any way, which is likely going  
25 to happen today, I don't want you to guess at

1 the -- the response -- or -- or -- you know,  
2 and otherwise, just if you're just not sure  
3 of the question, I want you to just let me  
4 know that. Okay?

5 A. Okay.

6 Q. All right. And also, when I ask you  
7 a question, we'll give your attorney, who's  
8 appearing today on the telephone, an  
9 opportunity to voice an objection. And just  
10 you wait to respond until after he has an  
11 opportunity to do that. Okay?

12 I don't expect that there's going to  
13 be -- that there's going to be anything where  
14 you're instructed not to answer, but we'll  
15 just -- and I want you to make sure that  
16 you -- that you let him have the opportunity  
17 to do that, okay.

18 So do you have any questions of me  
19 before we start or any questions for  
20 Mr. Swyers?

21 A. I don't.

22 Q. Okay. And just so -- I want to make  
23 it clear, our office represents the  
24 petitioners in this case, and you are here  
25 today to testify in your personal capacity

Page 10

1 and as a representative, a corporate  
2 representative, under Federal Rule 30(b)(6)  
3 for the registrant, PCNI, Inc.

4 Do you understand that?

5 A. I do.

6 Q. Okay. Okay, great.

7 And if there's any instruction that I  
8 left out along the way, if it -- if it  
9 becomes apparent that we need to -- to  
10 revisit it, I'll be sure to do that.

11 But why don't we start with can you  
12 give me your educational background?

13 A. I'm a physician.

14 Q. Okay. And where did you attend  
15 college?

16 A. University of Ibadan in Nigeria.  
17 Ibadan is spelled I-b-a-d-a-n.

18 Q. Okay. And that's in Nigeria?

19 A. In Nigeria, Ibadan Nigeria.

20 Q. Okay. And how about where did you  
21 obtain your medical degree?

22 A. In Ibadan, at the same university.

23 Q. Okay. And where -- and when did you  
24 receive your medical degree, what year?

25 A. June 1972.

1 Q. Okay. What kind of medicine do you  
2 practice?

3 A. I practice psychiatry.

4 Q. Okay. How long have you been  
5 practicing -- how long have you been a  
6 psychiatrist?

7 A. I completed my training in 1977.

8 Q. Okay. And you've been practicing as  
9 a psychiatrist since 1977 until the present  
10 time?

11 A. Correct.

12 Q. Okay. And can you just briefly tell  
13 me when you moved to America and where you've  
14 lived since you've moved here?

15 A. I've been in United States since  
16 1974, and I've consistently lived in New  
17 Jersey since 1974.

18 Q. Okay. And where do you currently  
19 reside?

20 A. 16 Wright Street, Edison, New Jersey.

21 Q. How long have you been at that  
22 address?

23 A. Since 1998.

24 Q. Okay. Okay. And you -- do you  
25 work -- okay. So where do you currently

1 practice medicine?

2 A. My office is at 100 Valley Road,  
3 Suite 1, Montclair, New Jersey 08820.

4 Q. Okay. And is it -- is it just you in  
5 the office or are there other physicians --  
6 is there other psychiatrists as well?

7 A. Just my office. I rent an office --  
8 a room there to another psychiatrist that  
9 comes in several days a week.

10 Q. Okay. And what's his name?

11 A. Valerie Verde, V-e-r-d-e, M.D.

12 Q. Okay. And your psychiatry practice,  
13 is that -- is there an entity registered in  
14 the State of New Jersey that you practice?  
15 In other words, is your practice part of a  
16 registered company?

17 A. Not incorporated company, no.

18 Q. It's -- it's not incorporated? Okay.

19 A. Yeah. I'm -- I'm a sole  
20 proprietorship of my -- of my practice --

21 Q. Okay.

22 A. -- with a Federal ID number.

23 Q. Okay. Do you have an ownership  
24 interest in any business entity?

25 A. No.

1 Q. Are you an officer of any business  
2 entity?

3 A. No.

4 Q. How about are you a director of any  
5 business entity?

6 A. No.

7 Q. Okay. How about social clubs, can  
8 you just describe to me briefly the different  
9 social clubs that you are a member of?

10 A. I'm a member of Anambra Enugu States  
11 Organization.

12 (Reporter clarification.)

13 BY MR. TAYLOR:

14 Q. Okay. Now, what is that  
15 organization?

16 A. It's a social club.

17 Q. Okay. Is it organized for a specific  
18 purpose?

19 A. It's networking and social services.  
20 They hold meetings, they hold parties, they  
21 look after the welfare of members.

22 Q. And where is that located?

23 A. It is located in New Jersey.

24 Q. Okay. Where specifically in New  
25 Jersey?

1           A.     In -- I don't -- I can't give you the  
2 address. I don't have the full address. But  
3 I'm also the registered agent of that  
4 organization.

5           Q.     Okay. Are there any other social  
6 clubs that you're a member of?

7           A.     Yes.

8           Q.     Okay. What are those?

9           A.     Enugu Ukwu Community, you can call it  
10 ECDU New Jersey. E-C-D-U New Jersey.  
11 E-n-u-g-w-u U-k-w-u-u[verbatim] Community  
12 Development, Union, New Jersey.

13          Q.     Okay. Can you describe the -- the --  
14 describe that social club to me?

15          A.     It's an -- it's a organization of  
16 members who look after their own interests.  
17 They network, they have meetings, they do  
18 social events, and they do charity work when  
19 they can for indigents of Enugu Ukwu and for  
20 our home town in Nigeria.

21          Q.     Okay. And where is that? Where is  
22 your hometown in Nigeria?

23          A.     Enugu Ukwu, E-n-u-g-w-u  
24 U-k-w-u[verbatim], Anambra State of Nigeria.

25                   (Reporter clarification.)

1 BY MR. TAYLOR:

2 Q. Okay. Now, do you hold any official  
3 position with ECDU?

4 A. No.

5 Q. Okay.

6 A. Member.

7 Q. Just member. Okay.

8 A. Yes.

9 Q. All right. How about are there any  
10 others?

11 A. These are the two.

12 Q. Any other -- I'm sorry. Are there  
13 any other social clubs that you're a member  
14 of?

15 A. These are the two I do remember right  
16 now.

17 Q. Okay. How about PC -- Peoples Club  
18 of Nigeria?

19 A. Yeah.

20 Q. Okay.

21 A. Of course I'm a member of Peoples  
22 Club of Nigeria.

23 Q. Okay. And which -- and which  
24 branches are you a member of?

25 A. I belong to the branch in Princeton,

1 Princeton Branch. It's called Princeton  
2 Branch of Peoples Club of Nigeria  
3 International.

4 Q. Okay. And what is your title in PCNI  
5 Princeton? Do you have one?

6 A. I'm a member, but I'm one of the  
7 national patrons of Peoples Club of Nigeria  
8 International. But specifically for -- for  
9 the Princeton Branch, I'm a member like  
10 anybody else.

11 Q. Have you -- in the -- in the past for  
12 PCNI Princeton have you held any other titles  
13 besides you're just a member?

14 A. Not for Princeton Branch.

15 Q. Okay. So just member?

16 A. Yes. The only thing, for Princeton  
17 Branch I'm also the agent, the -- the club  
18 agent.

19 Q. Okay. And what are your  
20 responsibilities as the -- the club agent?

21 A. To receive notification from the  
22 State of New Jersey when annual applications  
23 are due, and I forward that to the -- whoever  
24 is the current chair.

25 Q. Okay. So what kind of notifications?

1 You mentioned there are certain notifications  
2 that you receive.

3 A. Annual registration. Every year it  
4 states you have to register with the state or  
5 renew our registration. And as the agent,  
6 I'm the agent there to -- that's where the  
7 government sends the information.

8 Q. Do you --

9 MR. SWYERS: Can we go off the record  
10 for a brief movement?

11 MR. TAYLOR: Sure.

12 (Off-the-record discussion.)

13 MR. TAYLOR: We're going to go back  
14 on the record now.

15 BY MR. TAYLOR:

16 Q. Dr. Mgbako, just to make clear, you  
17 are the registered agent for PCNI Princeton  
18 Branch, correct?

19 A. That's correct.

20 Q. Okay.

21 MR. SWYERS: Thank you.

22 BY MR. TAYLOR:

23 Q. And PCNI Princeton is a separate  
24 branch from PCNI Princeton Junction?

25 A. Correct, yes.

1 Q. Okay.

2 Okay. So you mentioned that you  
3 were -- we were going through the different  
4 social clubs that --

5 MR. TAYLOR: And, by the way, for the  
6 record, Mr. Swyers, Gordian Ndubizu has  
7 just entered the -- the conference room  
8 and he's sitting to my left.

9 MR. SWYERS: Is he a representative  
10 of Princeton Junction?

11 MR. TAYLOR: Yes, he is. Yes.

12 MR. SWYERS: All right. Thank you.  
13 No objection.

14 BY MR. TAYLOR:

15 Q. Okay. Dr. Mgbako, you mentioned that  
16 you were also involved with PCNI, Inc.?

17 A. That's correct.

18 Q. And can you explain to me your title  
19 with PCNI, Inc.?

20 A. I don't understand the question.

21 Q. Well --

22 A. Which PCNI, Inc.?

23 Q. PCNI, the -- the entity that is --  
24 well, we're going to get to that in a little  
25 bit. But the subsidiary entity, PCNI

1 International, that's registered in New  
2 Jersey, I believe you testified that you were  
3 also affiliated with that organization.

4 A. Yes. I'm the incorporating agent. I  
5 am the agent of that organization.

6 Q. Okay. And what are your  
7 responsibilities as the incorporating agent?

8 A. I register the -- the company, I am  
9 one of the signatories to the bank account, I  
10 receive dues paid by other branches that are  
11 funneled through the bank accounts of that  
12 organization, and I send it to Nigeria, to --  
13 to the general account in Nigeria.

14 I'm also the agent that was empowered  
15 to register the trademark for Peoples Club of  
16 Nigeria. I'm also the agent that is  
17 empowered to monitor the use of the trademark  
18 and take actions against infringers, where  
19 necessary. I am the agent that hired the  
20 attorney that registered the trademark, and I  
21 worked with the attorney to register the  
22 trademark.

23 Q. Okay. We're going to -- we're going  
24 to discuss some of this in greater depth a  
25 little bit later.

1           So I want to -- first I want -- I  
2    want to ask, you mentioned that you -- I  
3    don't remember the spelling, but your  
4    hometown in Nigeria, how often do you visit  
5    Nigeria currently?

6           A.    Every year.

7           Q.    Every year.

8           When --

9           A.    I didn't -- I didn't go last year  
10   because of my wife's health condition, and I  
11   probably will not go this year because of my  
12   wife's health condition. But up until last  
13   year I've gone to Nigeria every year.

14          Q.    Okay. And when do you typically go  
15   to Nigeria?

16          A.    I usually go around May.

17          Q.    And how long do you stay?

18          A.    Two, three weeks.

19          Q.    Okay.

20                Okay. I want to -- I want to talk a  
21   little bit about the -- the -- about PC -- so  
22   now let me ask you, we were just discussing  
23   PCNI, Incorporated, which was a entity that  
24   was registered in 2010, and you testified  
25   that you were the agent empowered to register

1 that entity.

2 Prior to 2010, did Peoples Club of  
3 Nigeria have operations in the United States?

4 A. Yes.

5 Q. Okay. Can you describe that for  
6 me -- describe those for me?

7 A. The first branch of Peoples Club that  
8 was inaugurated in Nigeria was inaugurated on  
9 May 26, 1990.

10 Q. Okay. And just so I'm clear, that --  
11 in May 26, 1990, that was the first United  
12 States --

13 A. The first branch.

14 Q. -- branch of Peoples Club of Nigeria  
15 International?

16 A. International, yes.

17 Q. Okay.

18 A. And at the Houston branch. It was  
19 inaugurated in Houston.

20 Q. Okay. Now, prior to May 26th of  
21 1990, did Peoples Club of Nigeria have  
22 operations in the United States?

23 A. No.

24 Q. Was there a separate entity different  
25 than PCNI, meaning Peoples Club of Nigeria

1 International, that operated prior to 1990 in  
2 the United States?

3 A. No.

4 Q. Okay. So the branches of -- or  
5 explain to me -- we've been using this term  
6 branches for -- for the different PCNI  
7 entities. Can you describe to me what it  
8 means to be a PCNI branch?

9 A. Okay. PCNI was created in Nigeria in  
10 1971. That's headquarters in Nigeria. It  
11 has a constitution that spells out how  
12 branches are created, okay. It operates  
13 through branches. Each branch is given a  
14 license by the executive leadership of  
15 Peoples Club of Nigeria to be inaugurated  
16 after fulfilling certain requirements. When  
17 a branch is created it becomes affiliated  
18 with the club, it's the branch of the club  
19 that operates under the constitution of the  
20 club and under the bylaws of the branch where  
21 it is created. And there are 44 branches of  
22 such -- there are up to 44.

23 We recent -- up until December 2013,  
24 when three of the 44 branches were removed.  
25 And since December 2013, one other branch has

1 been created. So we're looking at about 42  
2 branches. There are branches in United  
3 kingdom, in Canada, 22 branches in Nigeria,  
4 and 18 branches today United States. Each  
5 branch has an executive leadership, a  
6 chairman, and officers who report to the  
7 executive president of the national  
8 president. The national president in our  
9 nation is the one that manages the affairs of  
10 all branches, the 42 branches, with his team  
11 in day-to-day function.

12 Q. Okay. So each branch has -- you just  
13 testified it has executive leadership who  
14 reports to PCNI in Nigeria. Can you tell me  
15 specifically who the branch leaders report to  
16 in PC -- in Nigeria? Who specifically do  
17 they report to?

18 A. Branches in Nigeria, they report to  
19 the president.

20 Q. And how about branches in the United  
21 States, who do they report to?

22 A. They report to the president.

23 Q. And the president of PCNI in -- in  
24 Nigeria?

25 A. Yes.

1 Q. Okay. And who is the president?

2 A. Doctor Joseph Ilonze, I-l-o-n-z-e.

3 Q. Okay. We'll discuss some of this in  
4 greater detail.

5 Okay. So -- so each branch operating  
6 in the United States has executive leadership  
7 for the specific branch?

8 A. Yes. For their branch, yes.

9 Q. Okay. And -- and use PCNI Princeton,  
10 for example. Can you explain to me the  
11 structure of that executive leadership?

12 A. PCNI Princeton Branch --

13 Q. Yes.

14 A. -- has a chairman who is elected.  
15 There's also other elected officers. That  
16 chairman has the responsibility of assuring  
17 that the branch functions consistent with the  
18 constitution of Peoples Club of Nigeria and  
19 the bylaws of the branch. That is his  
20 internal responsibility. He's also a member  
21 of the Central Executive Council of the  
22 branch and participates in deliberations of  
23 the Central Executive Branch, where decisions  
24 are made regarding the affairs of the  
25 organization internationally and nationally.

1 He is also a member of the Presenting  
2 Council. The Presenting Council is the  
3 national president, which is executive,  
4 patrons and trustees. They meet monthly in  
5 Nigeria to supervise and monitor and manage  
6 the Peoples Club of Nigeria monthly. The  
7 chair of the Princeton Branch is also a  
8 member of the annual general meeting, which  
9 is a member of all -- which is the group of  
10 all members of Peoples Club. They meet  
11 annually, okay, to make decisions that affect  
12 the club.

13 So the chair of Princeton Branch has  
14 both internal responsibilities, and they  
15 are -- these are the responsibilities that  
16 I've identified. He answers to the  
17 president, Ilonze, regarding affairs of the  
18 Peoples Club of Nigeria Princeton Branch,  
19 okay. Where he a foul --

20 (Reporter clarification.)

21 A. -- where he goes contrary to the  
22 constitution he can be sanctioned, he can be  
23 removed.

24 Q. Okay. And we'll discuss that a  
25 little bit later, the process for that.

1                   So I just want to make sure. So the  
2 CEB -- and what does that stand for again?

3 You mentioned the CE --

4       A.     CEC.

5       Q.     Okay, the --

6       A.     Central Executive Committee. It  
7 meets every -- every quarter.

8       Q.     And that's located in Nigeria?

9       A.     It's in Nigeria, the headquarters.

10      Q.     Okay. And the National Council is?

11      A.     Presenting Council.

12      Q.     That's also -- that's -- they meet in  
13 Nigeria?

14      A.     The presidents, they meet in Nigeria.

15      Q.     Okay.

16      A.     All these groups meet in Nigeria at  
17 the headquarters.

18      Q.     Can you briefly describe the  
19 structure of the National Council? Like who  
20 composes the National Council?

21      A.     The executive president of the  
22 national, Dr. Ilonze, the vice-presidents,  
23 okay, all elected officers of the club,  
24 patrons and trustees.

25      Q.     Okay. And what is a patron? Can you

1 describe that?

2 A. A patron is somebody who has met the  
3 conditions to be appointed. He is an  
4 appointed office, recognizing leadership  
5 responsibility for the club. He is  
6 appointed. A patron does -- a patron is part  
7 of the leaders of the group, but is an  
8 appoint office.

9 Q. Okay. So if -- it sounds to me that  
10 the branches located in the United States  
11 have contact with the PCNI entity that's  
12 located in Nigeria.

13 A. Say that again.

14 Q. It seems to me that the U.S.  
15 branches, the PCNI branches located in the  
16 United States, have contact, regular contact,  
17 I would say, with members in Nigeria of PCNI.

18 A. I don't understand the question.

19 Q. So the -- so the members of the  
20 various branches in the United States of  
21 PCNI, right, they have contact with the  
22 members of PCNI located in Nigeria; there's  
23 communication there?

24 A. No, you -- if you are talk -- who do  
25 you call members?

1 Q. Well, can you -- maybe you can  
2 describe it to me. You just described to me  
3 what a patron is. What -- what is a -- what  
4 would be a member -- who would be a member?

5 A. A member is an individual who has  
6 been accepted in a branch and who has been  
7 inducted by the -- who has been inducted by  
8 the national. To be a member you apply to a  
9 local branch of where you stay, where you  
10 live. If you meet the qualifications for  
11 membership, the branch will accept you, and  
12 then you'll be inducted. And to be inducted,  
13 the president of -- the national president,  
14 with his team, will come to where that branch  
15 is located and induct you. Induct you means  
16 you pledge allegiance to the constitution of  
17 Peoples Club of Nigeria and to your bylaws,  
18 okay. So any member of the club belongs to a  
19 branch. Nobody -- everybody belongs to a  
20 branch, including patrons.

21 Q. And members of the executive  
22 leadership in the individual branches, they  
23 are also members of that branch?

24 A. You have to be a member of that  
25 branch to be elected. And there is -- there

1 is specified requirements to apply for  
2 office. For example, you cannot be a  
3 chairman if you have not been a member for  
4 five years.

5 Q. Okay. And you said -- can you  
6 describe those five requirements and -- and  
7 describe to me what they are?

8 A. Five requirements?

9 Q. Isn't that what you -- isn't that  
10 what you just said? Did I mishear you?

11 A. No, I don't know what you mean.

12 Q. Okay. I'm sorry, I think I just  
13 misheard you.

14 So let me ask the question again a  
15 different way.

16 So the executive leadership in the  
17 individual branches, they have contact with  
18 the leadership of PCNI in Nigeria?

19 A. The chairman. Not the executive  
20 leadership, the chairman of the club.

21 Q. The chairman does?

22 A. Yes. Not the secretary and not a  
23 member.

24 (Reporter clarification.)

25 A. No, not the secretary. The chairman

Page 30

1 is the one recognized -- recognized as the  
2 leader of that branch --

3 Q. Understood. Okay.

4 A. -- with his secretary, the secretary  
5 of the branch. But other members, they don't  
6 have direct. We are members of one club. A  
7 member can attend a social function, also  
8 anybody. But in terms of function and  
9 operations, the chair of the branch is the  
10 recognized leader of that branch, working  
11 with his secretary. That is the  
12 responsibility, to run the branch and to  
13 assure that the branch functions within the  
14 constitution of the Peoples Club. That's the  
15 way it is in Nigeria and everybody else --  
16 everywhere else.

17 Q. Okay. So I want to bring -- let's go  
18 back and discuss PCNI, Inc. And specifically  
19 I'm referring to the entity that was  
20 registered in the State of New Jersey in  
21 2010. And I have two documents here.

22 MR. TAYLOR: Matt, I'm pulling out  
23 here P-3 and P-4.

24 MR. SWYERS: Fantastic. Thanks for  
25 the reference.

1 BY MR. TAYLOR:

2 Q. There we go.

3 Okay. So just -- Mr. -- Dr. Mgbako,  
4 I just handed you P-3, which is bearing  
5 Petitioners -- Bates stamp Petitioners 0037.

6 And are you familiar with this  
7 document?

8 A. Yes, I am.

9 Q. Okay. And what is this document?

10 A. It is the Certificate of Registration  
11 of PCNI.

12 Q. Okay. And I believe earlier you  
13 testified that you were responsible for  
14 filing this certificate?

15 A. Yes, I was.

16 Q. Okay. Okay. I'd like to bring your  
17 attention to the other document I handed you;  
18 it's marked P-4, and that's bearing  
19 Bates-stamped Petitioner 0048 and 0049.

20 Are you familiar with this document?

21 A. Yes, I am.

22 Q. And on the bottom of the first page  
23 of the document there's a signature there.  
24 Is that your signature?

25 A. No. That is the signature of the

1 attorney that did incorporation.

2 Q. Okay. And what is this document,  
3 P-4? Can you describe it?

4 A. It's a document that said the name of  
5 the corporation, the purpose for which it is  
6 being organized, the registered agent's name,  
7 the corporation, the rights --

8 Q. It appears that --

9 A. -- the elected trustees. Yes.

10 Q. Okay. And it appears at the top, it  
11 appears that this is an application for a  
12 nonprofit corporation?

13 A. Yes.

14 Q. Okay. Can you tell me why -- or I  
15 believe you testified that you were given  
16 instruction to file a business certificate  
17 for PCNI, Inc. in 2010; is that correct?

18 A. A business certificate? I don't  
19 understand that.

20 Q. Well, I understand that you were  
21 given instruction to register a business  
22 entity known as PCNI, Inc., or PCNI.

23 A. I was given the instruction to  
24 register as subsidiary of the Peoples Club of  
25 Nigeria International.

1 Q. Okay. Now, who gave you that  
2 instruction?

3 A. That decision was made at the -- by  
4 the executive leadership of the club in  
5 Houston, New Jersey[verbatim] in 2010, in the  
6 month -- in the week of -- the month in  
7 August 2010.

8 (Reporter clarification.)

9 A. Houston, New Jersey. Houston,  
10 Houston.

11 BY MR. TAYLOR:

12 Q. Houston, Texas?

13 A. Yes.

14 Q. Okay.

15 A. Houston, Texas. Houston, Texas.

16 Q. Okay.

17 A. And that decision was made by the  
18 leadership that consists of the chairman of  
19 the Management Committee, patrons and  
20 trustees that were at the meeting, and other  
21 high place officials, in 2010.

22 Q. So the leadership in PCNI Houston was  
23 responsible for giving you instruction to  
24 register the subsidiary of PCNI?

25 A. Yes.

1 MR. SWYERS: Objection as to form.

2 That's not what he testified.

3 BY MR. TAYLOR:

4 Q. Okay. So, just so I'm clear, who  
5 the -- okay.

6 Can you identify the individuals that  
7 gave you the instruction to file the  
8 subsidiary in New Jersey?

9 A. They were people at the meeting  
10 consisting of Chief Onwuachu, Chief Onwuachu,  
11 Fabian Onwuachu, F-a-b-i-a-n Onwuachu,  
12 O-n-w-u-a-c-h-u; Ojukwuike, Chief Ojukwuike,  
13 O-j-u-k-w-u-i-k-e; Professor Aluka,  
14 A-l-u-k-a, Innocent Aluka, Professor Innocent  
15 Aluka, A-l-u-k-a; Doctor Joseph Ilonze.  
16 Remember the people who were at the meeting.  
17 Chief Desmond Ogugua, who was the at the  
18 meeting, and others, Ogugua, O-g-u-g-u-a, and  
19 Sam Iwuchukwu, S-a-m I-w-u-k-w-u[verbatim],  
20 Chief Fidelis Okekearu, Fidelis,  
21 F-i-d-e-l-i-s, O-k-e-k-e-a-r-u, myself, I was  
22 at that meeting.

23 These -- these were the people that  
24 were the delegates from Nigeria that came in  
25 August 2010 for inauguration -- for induction

1 of members in Houston branch. And usually  
2 there's a meeting prior to that. At that  
3 meeting the welfare of the club was discussed  
4 and issues related to the club, and decisions  
5 were made there. Because of the expanding --  
6 the rapid expansion of the club, decisions  
7 were made, one of which was to apply for a  
8 trademark, establish a subsidiary club in  
9 Nigeria, okay, and I was given -- Dr. Aluka  
10 and I were directed to do that. I had a  
11 lawyer that could do that, so I took the lead  
12 in doing that. I was given \$5,000, okay, to  
13 apply for the trademark, to establish the  
14 club in the United States, and also to work  
15 on converting the corporation to a 501c3 so  
16 that the club can -- the branch -- the  
17 subsidiary can coordinate charity activities  
18 in the United States. That's where that  
19 instruction came from.

20 Q. Okay. You just mentioned here -- I  
21 want to show you some documents.

22 MR. TAYLOR: Matt, I'm showing  
23 Dr. Mgbako what is marked as P-17.

24 MR. SWYERS: Thank you.

25 MR. TAYLOR: Okay.

1 BY MR. TAYLOR:

2 Q. And, Doctor, I'm handing you now what  
3 is marked as Plaintiff's Exhibit P-17. Are  
4 you familiar with this document?

5 A. Yes. This is my signature.

6 Q. Okay. And that's your signature  
7 there at the bottom?

8 A. Yes.

9 Q. And it looks like this document was  
10 signed on August 21, 2010.

11 A. That's correct, yes.

12 Q. And you just testified that you  
13 received a sum of \$5,000 to take a series  
14 of -- of actions. And I want you to review  
15 this document here and tell me, is this  
16 consistent with what your instructions were  
17 in August of 2010?

18 A. Exactly, yes.

19 Q. Okay. Okay.

20 MR. TAYLOR: Matt, I have what's  
21 marked here as P-18 --

22 MR. SWYERS: All right. Thank you.

23 MR. TAYLOR: -- I want to show Dr.  
24 Mgbako.

25 BY MR. TAYLOR:

1 Q. Dr. Mgbako, I'm handing you now what  
2 is marked as P-18. Take a look at that.

3 Are you familiar with this document?

4 A. Yes.

5 Q. Okay. And this document is a letter  
6 from your letterhead dated August 23, 2010,  
7 to a Sebastian Ibezim, I-b-e-z-i-m, Esquire.

8 Was that -- who was Mr. Ibezim?

9 A. He's the lawyer.

10 Q. And which lawyer specifically?

11 A. He is the lawyer that I hired to  
12 incorporate the club and help me with  
13 locating registrants on -- or somebody to  
14 help us register our trademark.

15 Q. Okay. And was -- did Mr. Ibezim  
16 locate an attorney to help you register the  
17 trademark in 2010?

18 A. He did.

19 Q. Okay. And who was that attorney?

20 A. Klauber & Jackson.

21 Q. Okay.

22 (Reporter clarification.)

23 A. Klauber, k-l-a-u-b-e-r, & Jackson,  
24 LLC.

25 BY MR. TAYLOR:

1 Q. On the document you have there, P-18,  
2 on the bottom of the letter, to the right of  
3 your signature there is a photocopy of a  
4 check bearing check number 130 dated  
5 August 23, 2010.

6 Do you remember writing this check  
7 and signing this?

8 A. Yes.

9 Q. And what was the purpose of writing  
10 this check to the Law Firm of Klauber &  
11 Jackson?

12 A. Trademark application.

13 Q. Okay. And that check was written in  
14 the amount of \$1,210?

15 A. Yes.

16 Q. Okay. Did Klauber & Jackson ever  
17 register a trademark for PCNI?

18 A. They did not.

19 Q. And why is that?

20 A. What our -- when we looked into why  
21 not -- that is a good question. When we  
22 looked into why not in 2013, Ibezim told me  
23 it takes three to four years -- two to  
24 four years to completely get the certificate.

25 When that did not happen in 2013, I

1 contacted that office, because Ibezim moved  
2 back to Nigeria. And I was told that the --  
3 the file was inactive. The reason the file  
4 was inactive was there was no response.  
5 That's what I was told. There were requests  
6 for information that they did not receive  
7 from Ibezim's office and the case was closed.

8 Q. Okay.

9 A. So they asked me to reactivate the  
10 case if I wished to go on with the  
11 application.

12 Q. To your knowledge, did Klauber &  
13 Jackson do any -- provide any legal work on  
14 behalf -- on your behalf?

15 A. I signed a contract with them. I  
16 don't know what they did after I signed the  
17 contract.

18 Q. Okay.

19 A. They were -- they were supposed to go  
20 through Ibezim to me.

21 (Reporter clarification.)

22 A. Go through the lawyer to me.

23 Q. Do you know if the law firm Klauber &  
24 Jackson ever performed a -- a search of any  
25 kind?

1 A. Oh, yes. They searched.

2 Q. They did.

3 And did you pay them to do that  
4 search?

5 A. They searched, and that's part of  
6 what we paid for, yes.

7 Q. Did the law firm, Klauber & Jackson,  
8 share the results of that search with you?

9 A. Ibezim did, yes, he shared.

10 Q. After you wrote this check dated  
11 August 23, 2010, to Klauber & Jackson, did  
12 the -- did the firm perform any legal  
13 services?

14 A. They were supposed to perform legal  
15 services.

16 Q. Okay.

17 A. They gave me an itemized -- there was  
18 a projection of itemized costs, what it will  
19 cost through various phases, which I agreed  
20 to before I signed the contract with them.  
21 And after signing the contracts, Mr. Ibezim  
22 left, and whatever information they asked  
23 they didn't ask me direct, and that's --  
24 that's what happened.

25 Q. Okay. Did you have contact with the

1 law firm Klauber & Jackson after this  
2 August 23, 2010, letter was sent to them?

3 A. My first contact with them was in  
4 2013. Ibezim's firm was supposed to handle  
5 that, written, and get back to me.

6 Q. Okay. All right. I want to go back  
7 to -- to discuss PCNI and the operations in  
8 Nigeria. You explained to me a little bit  
9 about the organizational structure of PCNI in  
10 Nigeria, and can you tell me again who is the  
11 president of PCNI?

12 A. Doctor Joseph Ilonze, I-l-o-n-z-e.

13 Q. Okay. And are you aware that there  
14 is disagreement on whether Dr. Ilonze is the  
15 president of PCNI?

16 A. Peoples Club of Nigeria International  
17 has no disagreement about who is their  
18 president. Their president is Dr. Joseph  
19 Ilonze.

20 Q. Okay.

21 MR. TAYLOR: Okay. Matt, I have here  
22 what is marked as P-5 that I'd like to  
23 show to Dr. Mgbako. Okay. I'm handing  
24 that -- that document to him now.

25 BY MR. TAYLOR:

1 Q. Okay. Dr. Mgbako, I just handed you  
2 a document labeled P-5 bearing Bates stamps  
3 Petitioners 0068 and 0069.

4 Are you familiar with this document?

5 A. I saw this letter, yes.

6 Q. Okay. And that's because it was sent  
7 to all PCNI branches and all members of PCNI?

8 A. Yes.

9 Q. Okay. And on the left-hand side of  
10 this document there is a listing of different  
11 individuals. Do you see that?

12 A. Yes, um-hmm.

13 Q. Can you tell me who is listed as the  
14 president?

15 A. Chief Sam Iwuchukwu.

16 Q. Okay. And can you turn to -- to the  
17 second page of this letter --

18 A. Yes.

19 Q. -- and tell me who signed this  
20 letter?

21 A. It was signed by Chief Sam Iwuchukwu  
22 and Alhaji Obinwa, O-b-i-n-w-a.

23 Q. Okay. And this letter is dated  
24 July 16 of 2014?

25 A. Correct.

1 Q. You mentioned Dr. -- that Dr. Ilonze  
2 is the current president of PCNI. Can you --  
3 how long has he been the president?

4 A. He's been the president since  
5 December 2013 -- two thousand and -- yeah, I  
6 think that's it, or 212. He's been president  
7 a few years. I may not be right about exact  
8 date.

9 Q. Okay. Any idea why this letter would  
10 be -- why this letter indicates a different  
11 president and why Mr. Iw --

12 A. Iwuchukwu?

13 Q. Yeah.

14 -- is -- is the president -- is  
15 identified as the president?

16 A. Mr. Iwuchukwu is not the president of  
17 Peoples Club of Nigeria, he is an expelled  
18 member. He is not a -- a member of Peoples  
19 Club of Nigeria International. He's been  
20 expelled by the club.

21 Q. Okay. We'll get -- we'll get to  
22 that.

23 A. Okay.

24 Q. Okay.

25 MR. TAYLOR: Mr. Swyers, I have

1 here -- I'm going to hand Dr. Mgbako  
2 what's marked as P-6.

3 MR. SWYERS: Thank you.

4 BY MR. TAYLOR:

5 Q. Dr. Mgbako, I just handed you a  
6 document identified as P-6 bearing Bates  
7 stamp Petitioners 0070.

8 And are you familiar with this  
9 document?

10 A. Yes, I am.

11 Q. And this is a document from  
12 letterhead of Peoples Club of Nigeria  
13 International dated July 16, 2014?

14 A. Yes.

15 Q. Okay. And can you -- do you see on  
16 the left side of this letter a listing of  
17 names?

18 A. Yes.

19 Q. And can you identify for me who is  
20 listed -- who is named the president?

21 A. Chief Sir J.I. Ilonze, I-l-o-n-z-e.

22 Q. Okay. And can you then tell me who  
23 signed this letter?

24 A. Chief Sir Dr. J.I. Ilonze, Honorable  
25 Smart Ebere, Secretary.

1 MR. TAYLOR: Okay. Matt, I have  
2 what's marked as P-7 here. I'm going to  
3 hand it to Dr. Mgbako.

4 BY MR. TAYLOR:

5 Q. There you go.

6 MR. TAYLOR: I've handed that to him.

7 BY MR. TAYLOR:

8 Q. P-7 is document -- is stapled two  
9 pages bearing Bates stamp Petitioners 0236  
10 and 0237.

11 And, Doctor Mgbako, are you familiar  
12 with the -- with the -- the letterhead, with  
13 these two documents here -- or these two  
14 pages that I've handed you?

15 A. The letterhead?

16 Q. Yes.

17 A. Yes.

18 Q. Now --

19 A. But not -- but not the names.

20 Q. Okay. So the -- would you agree with  
21 me that the -- the letterhead is nearly  
22 identical, beside for the named individuals  
23 on the letterhead?

24 A. The letterhead is -- is our  
25 letterhead, but the names of the individuals

1 there are not members of Peoples Club.  
2 They've been all expelled.

3 Q. And just for clarity, are you  
4 referring to the names on the first page with  
5 the Bates number Petitioners 0236?

6 A. 0236, yes. All the names listed  
7 here, somebody got ahold of a letterhead and  
8 listed members here. These people are not  
9 members of Peoples Club. They are all  
10 imposters, all been expelled. Nobody here  
11 can go to corporate affairs of Nigeria, where  
12 this club is registered, and get these names  
13 as members. They are not members of Peoples  
14 Club. This is an imposter document.

15 Q. Okay.

16 MR. TAYLOR: All right. And, Matt, I  
17 have here in my hand what's marked as  
18 P-10, and I'm going to hand that to  
19 Dr. Mgbako.

20 MR. SWYERS: Thank you.

21 BY MR. TAYLOR:

22 Q. Okay. Dr. Mgbako, I just handed you  
23 a document identified as P-10 bearing Bates  
24 stamp Petitioners 0084.

25 Are you familiar with this document?

1 A. I'm not.

2 Q. Can you tell me what is the Orlu  
3 branch of PCNI? Are you familiar with that?

4 A. There is an Orlu branch at PCNI, yes.

5 Q. And where is the Orlu branch located?

6 A. In Nigeria.

7 Q. Where in Nigeria?

8 A. I believe it's Emu States.

9 (Reporter clarification.)

10 A. In Nigeria, I think it's Emu States  
11 of Nigeria. I am not sure, but it's in  
12 Nigeria, eastern part of Nigeria.

13 Q. Okay. And do you see at the bottom  
14 there are two signatures there, one by a  
15 chairman and one by a secretary?

16 A. Yes.

17 Q. Are you -- do you -- are you familiar  
18 with those individuals?

19 A. I don't know them.

20 Q. You've never met them?

21 A. Never met --

22 MR. SWYERS: For the record, I just  
23 want to insert an objection on  
24 authenticity and foundation. But please  
25 continue.

1           A.     I don't know them.  I've never met  
2  them.

3  BY MR. TAYLOR:

4           Q.     Okay.  And this letter here, you  
5  never received this letter?

6           A.     I've never seen this letter.

7           Q.     Okay.  Are you -- are you aware  
8  that -- strike that.  Okay.

9                   MR. SWYERS:  And if we're moving on,  
10           since we have a pause here, I'll just once  
11           again restate the objection on the grounds  
12           of authenticity and foundation on P-10,  
13           not in reference to the testimony but in  
14           reference to the actual letter coming into  
15           evidence in this matter as it has not  
16           been, you know, verified as to the  
17           authenticity or a proper foundation laid  
18           for it coming in.  Thank you.

19  BY MR. TAYLOR:

20           Q.     Okay.  I want to talk about the PCNI  
21  branches again.  And the -- I believe you  
22  testified that the branches operating in the  
23  United States received their authority to  
24  operate from PCNI in Nigeria.

25           A.     Yes.

1 Q. Okay. Can you briefly describe to me  
2 the process for forming a PCNI branch in the  
3 United States?

4 A. If I want to form a branch today in  
5 Lawrenceville -- I'm going to use that as an  
6 example; there's no branch at Peoples Club of  
7 Nigeria in Lawrenceville -- and I want to  
8 establish one here and I am a resident here,  
9 what I have to do is to become a member with  
10 at least four other people of a recognized  
11 branch here and become inducted. Inducted  
12 means you've been sworn in as a member of  
13 club, okay. After a period of time of  
14 membership the branch that will agree to  
15 sponsor me here in Lawrenceville as a new  
16 branch here will agree that I applied to  
17 Nigeria to establish a branch here. That  
18 application goes to the president of the  
19 club, and the president will present this  
20 application, verify qualifications, present  
21 this application to the Central Executive  
22 Committee. If my application is accepted to  
23 establish a branch here, I will be asked to  
24 go ahead and begin the formation. I will  
25 establish a date to be inaugurated, I will

1 assure that we've met all the requirements  
2 for membership, as stipulated in our  
3 constitution. In other words, I will make  
4 sure that there are 20 members that became  
5 members of this branch, and I will assure to  
6 the central executive that all requirements  
7 stipulated in the committee are met. We set  
8 a date, the national president will come  
9 here, will come to Lawrenceville or anyplace  
10 around here that I designate, with his team  
11 of executive leaders, including patrons and  
12 trustees. In a national -- in a colorful  
13 ceremony, my branch will be inaugurated. And  
14 after the inauguration of my branch I'll be  
15 given a charter. A charter is a license to  
16 operate. After I'm given a -- a license to  
17 operate, those 20 members who qualify as  
18 members -- those 20 members who qualify as  
19 members will each be inducted. They raise  
20 their hand before a legal officer appointed  
21 by the club and swear an oath of allegiance  
22 to the constitution and bylaws of the club.  
23 And that is how you become a member and  
24 how -- that's how Lawrenceville branch will  
25 be created.

1           Once that charter is created, the  
2 chair of the branch, assuming I'm the chair  
3 of the branch, will assure that the  
4 operations of the branch are consistent with  
5 the constitution and bylaws that I've  
6 established. I will also assure that my  
7 operations -- this club is registered and  
8 operate consistent with the local rules here  
9 in the State of New Jersey, and what all the  
10 requirements of a registered corporation have  
11 to meet, okay. The license to operate will  
12 remain active for as long as I meet the  
13 conditions to be a member -- I mean the  
14 branch to be a member, 20 members that pays  
15 social dues. Social Security dues is paid by  
16 each member every year, January 1st of every  
17 year, and each branch has to have at least  
18 20. Pay their dues, that's the national  
19 dues, that keeps you as an inducted member.  
20 Do not pay their dues, do not attend the  
21 meetings in this branch, you'll become  
22 inactive. When you became inactive you are a  
23 non-member. If I or my branch do not meet  
24 the requirements to continue to be a member,  
25 if I go afoul of the constitution, if I can't

1 meet any -- any act that is deemed by the  
2 Central Executive of contrary to the  
3 interests of Peoples Club of Nigeria  
4 International, that license I was given will  
5 be withdrawn and the branch will be  
6 dissolved. So that the fact you have a -- a  
7 charter does not make you a branch forever.  
8 You still have to meet the requirements to be  
9 active there. And that's -- that's -- that's  
10 the way to operate.

11 Q. Okay. Have you ever personally  
12 opened a branch in -- a PCNI branch in the  
13 United States?

14 A. I have never opened, personally  
15 opened one.

16 Q. Okay. Now, is there a capital -- an  
17 initial capital contribution as part of the  
18 process to form a branch?

19 A. There are stipulations that you meet,  
20 and when you apply to be a branch you'll be  
21 given the stipulations. I cannot give you  
22 specific details about that. But before the  
23 executive -- before Onisha comes here to  
24 inaugurate you, whatever you're required to  
25 do, you're supposed to do then. I can't give

1 you specific details of what is required.

2 Q. Okay.

3 MR. TAYLOR: Matt, I have what's been  
4 marked as P-23.

5 MR. SWYERS: Thank you.

6 MR. TAYLOR: Yup. And I'm going to  
7 hand that do to Dr. Mgbako.

8 BY MR. TAYLOR:

9 Q. Here you go. Dr. Mgbako, I've just  
10 handed you what is marked as P-23 bearing  
11 Bates-stamped Petitioners 0166. And this  
12 is -- are you -- are you familiar with this  
13 document?

14 A. No, I've never seen it.

15 Q. Have you ever seen anything similar  
16 to this letter?

17 A. No.

18 Q. Okay. Well, this letter is dated --

19 MR. SWYERS: And just so -- if I may  
20 interject. Forgive me. For the record, I  
21 will go ahead and object to P-23 on  
22 authenticity and foundation grounds.

23 Thank you.

24 BY MR. TAYLOR:

25 Q. Okay. As you look at this document,

1 does this refresh your memory as to any  
2 capital contributions that are required in  
3 order to form a PCNI branch in the United  
4 States?

5 A. As I said earlier, I cannot testify  
6 to this. There may or may not be a  
7 requirement. And if there is, I cannot  
8 testify to the authenticity of this document  
9 because, as I said, I haven't formed a branch  
10 myself, so I've never received -- I haven't  
11 seen this before. But I know there are  
12 contributions that are supposed to be made.  
13 I don't know what they are.

14 Q. Okay. So the -- the branches in  
15 Nigeria -- this is -- I want to ask you, are  
16 you -- do you have knowledge of -- of whether  
17 the branches in Nigeria have one  
18 incorporation at the -- in other words, are  
19 the branches incorporated individually in  
20 Nigeria or is it just one incorporation on a  
21 federal level so that all the branches are  
22 part of just one entity?

23 A. I cannot testify to that. I know  
24 that Peoples Club of Nigeria is a corporation  
25 that is registered in Nigeria, it's

1 incorporated in Nigeria. I cannot testify  
2 what individual branches in Nigeria are also  
3 incorporated or not.

4 Q. Okay. And how about in the United  
5 States, are the individual -- are the  
6 branches operating in the United States  
7 incorporated individually?

8 A. Yes, they are incorporated  
9 individually.

10 Q. Okay. And they're incorporated in  
11 the state in which --

12 A. In the --

13 Q. -- the club operates?

14 A. Yes.

15 Q. So -- okay. To your knowledge, is  
16 there one constitution and set of bylaws that  
17 applies to all of the PCNI branches in the  
18 United States?

19 A. There is one constitution developed.

20 Q. And that applied -- does that apply  
21 internationally, that applies to all PCNI?

22 A. That is internationally. No -- no  
23 branch at PCNI is allowed to develop its own  
24 constitution. It has to be bylaws of the --  
25 derived from the constitution. And where

1 there is a conflict in the constitution of  
2 the rules...

3 Q. So you testified that you understand  
4 that the PCNI branches in the United States  
5 are separately -- are separate entities of  
6 the individual states in which they operate;  
7 is that correct?

8 A. Yeah, they're registered --

9 Q. Okay.

10 A. -- where they operate, yes.

11 Q. And many of the PCNI branches were  
12 registered entities prior to 2010, to your  
13 knowledge? Some were at least?

14 A. Some were, yes.

15 Q. Were -- to your knowledge, were the  
16 petitioner branches -- we can go by --  
17 through them individually. So was PCNI  
18 Princeton Junction a registered entity prior  
19 to 2010?

20 A. Yes.

21 Q. Was PCNI Miami a registered entity  
22 prior to 2010?

23 A. Yes.

24 Q. And was PCNI Chicago also a  
25 registered entity prior to 2010?

1 A. Yes.

2 Q. And we -- you just explained in  
3 detail the way -- the process that applies to  
4 the formation of a PCNI branch in the United  
5 States. Can you explain to me the way that a  
6 branch is dissolved in the United States, a  
7 PCNI branch in the United States?

8 A. You stop operating. When the -- when  
9 the executive -- when Onisha decide that you  
10 stop operating --

11 (Reporter clarification.)

12 A. When the leadership in Onisha decide  
13 that a branch winds down, the branch winds  
14 down.

15 Q. Okay. Are you aware of any formal  
16 procedure that must take place in order to  
17 dissolve a PCNI branch in the United States?

18 A. You have to -- you have to follow due  
19 process. You have to -- there has to be a  
20 meeting, the annual general meeting where  
21 decisions are made will have to review the  
22 basis for deciding whether to dissolve or not  
23 to dissolve and make a decision.

24 Q. Can you describe this -- you -- can  
25 you describe what you mean by due process?

1           A.     Due process means you -- you must  
2     have been told that your -- that your branch  
3     is required to do certain things, and if you  
4     don't do certain things and whatever you've  
5     done is contrary to the welfare or the  
6     interest of the club, if you don't meet  
7     those -- do those things that you're required  
8     to do at the annual general meeting you can  
9     be dissolved, at the central executive  
10    meeting you can be dissolved. That's -- when  
11    that decision is made, that decision is made.  
12    That will be made internally.

13          Q.     And by "dissolve" do you mean a  
14    revocation of the charter to operate the  
15    branch in the United States?

16          A.     Revocation. You're supposed to  
17    operating -- you're supposed to function as  
18    a -- as a branch.

19          Q.     Okay. And that's what -- that's what  
20    you mean by the -- by dissolution of the  
21    branch?

22          A.     Yes. You're no longer -- you are no  
23    longer recognized. You don't attend any  
24    meetings of the club, don't answer the name  
25    of the club, you don't operate as a -- as the

1 club, wherever you are. You cease from  
2 operating.

3 Q. This dissolution or revocation  
4 process does not affect the individual  
5 registration of each PCNI branch within the  
6 state that they operate though, correct?

7 A. You have sworn an affidavit to the  
8 constitution of the club. So if the club  
9 asks you to wind down, you wind down. If the  
10 club asks you to dissolve yourself, you  
11 dissolve yourself. If you refuse to dissolve  
12 yourself, you are contrary -- you're not  
13 acting consistent with the constitution.

14 Q. And by dissolve yourself you mean --

15 A. Stop operating. Wind down. You're  
16 no longer a branch. Don't call yourself a  
17 member of Peoples Club. That's what I mean  
18 by dissolution. Whether you see you have a  
19 piece of registration from where you are  
20 means nothing to us. We've given you a  
21 charter, you accepted the charter, you -- you  
22 swore an oath. Well, we've told you that  
23 this charter no longer applies to you. We've  
24 taken the charter back, okay. We've -- if we  
25 give you that information -- we are social

1 club -- you stop operating as one of us.  
2 You -- if you -- if you've registered as a  
3 particular entity in a state where you are,  
4 if you're a true citizen of our club you  
5 should go back and reverse that. If you  
6 don't want to do that, that's your problem,  
7 but don't answer our name. The only proffers  
8 of registering as a legal entity where you  
9 are is to make sure that all our branches  
10 are -- operate consistent with the laws of  
11 where they are. If I am Lawrenceville  
12 branch, I have to pay taxes due in  
13 Lawrenceville. That is the only reason why  
14 that club has to be registered where they  
15 are.

16 Q. Okay.

17 MR. TAYLOR: All right. Matt, I have  
18 here what's marked as P-19 that I'd like  
19 to show to Dr. Mgbako.

20 BY MR. TAYLOR:

21 Q. Okay. Here you go, Dr. Mgbako. And  
22 I've handed you a document that's been  
23 labeled as P-19. It's been Bates-stamped  
24 Petitioners 0202 through 0218.

25 Are you familiar with this document?

1 A. I'm not.

2 Q. Is this -- are you aware if this is  
3 the Peoples Club Constitution Bye-Laws and  
4 Standing Orders?

5 A. I'm not.

6 Q. Okay. You've never seen this  
7 document before?

8 A. I haven't seen this.

9 Q. But you have seen the PCNI  
10 Constitution and Bylaws?

11 A. Not this one, but yes.

12 Q. Okay. So you believe that there --  
13 do you have any reason to believe that this  
14 is not an authentic document?

15 A. I have not seen a constitution that  
16 says Peoples Club Constitution Bye-Laws and  
17 Standing Orders. I haven't seen one. This  
18 is the first time I'm seeing this.

19 Q. Okay. How about --

20 MR. SWYERS: So, you know, consistent  
21 with before, I'll insert an objection of  
22 authenticity, of course, and then  
23 foundation as well. Thank you.

24 MR. TAYLOR: Sure.

25 BY MR. TAYLOR:

1 Q. Okay. Dr. Mgbako, I'd like to ask  
2 you to flip to the second page of this -- of  
3 the clipped packet I gave you there, to 0203.  
4 And take a look at the -- the Table of  
5 Contents there.

6 Does that look familiar to you?

7 A. No.

8 Q. Okay. I'd like to ask you to flip to  
9 page -- to page -- it's labeled as  
10 Petitioners 0211 and --

11 MR. SWYERS: A continuing objection.

12 BY MR. TAYLOR:

13 Q. -- 0212. Specifically, I'd like to  
14 bring your attention to Sections 17 and 18  
15 entitled Loss of Benefits and Membership of  
16 the Club and Suspension of Members.

17 Are you -- do these sections here  
18 look familiar?

19 A. No.

20 Q. Are you --

21 A. This document is not Peoples Club of  
22 Nigeria constitution.

23 Q. Okay. What -- what is it?

24 A. This, I don't know what is it. I  
25 don't know who gave you this. I don't know

1 what this is. If you want --

2 MR. SWYERS: Hence the purpose --  
3 hence the purpose of my objection for  
4 authenticity. The witness isn't able to  
5 verify the document, and so the question,  
6 well, what is it, he can only say what he  
7 can say, which is he doesn't know.

8 MR. TAYLOR: Understood.

9 BY MR. TAYLOR:

10 Q. Okay. Dr. Mgbako, is the  
11 constitution of PCNI registered -- registered  
12 with the Corporate Affairs Commission in Nigeria, to your  
13 knowledge?

14 A. Yes.

15 Q. It is.

16 And are you in possession of a copy  
17 of the constitution?

18 A. I am not.

19 Q. Are you able to obtain a copy of it?

20 A. You can request it through the  
21 national president, Dr. Ilonze. If you  
22 request it, I will make sure that he gets you  
23 a copy. And I think you should. There are  
24 all kinds of documents floating around.

25 Q. Okay.

1           MR. TAYLOR: For the record, we'd  
2           like a copy of that(REQUEST). I'm not  
3           sure if it was requested in our Notice to  
4           Produce Documents, but that's something,  
5           Mr. Swyers, we'd like to -- we can discuss  
6           off the record.

7           MR. SWYERS: Fair enough.

8 BY MR. TAYLOR:

9           Q. To your knowledge, is the dissolution  
10          and revocation process that would apply to a  
11          PCNI branch in the United States written  
12          anywhere? Do you understand my question?

13          A. The dissolution process, there is no  
14          specific dissolution process written for  
15          Peoples Club of Nigeria in United States.  
16          It's all the same. It's all going to be in  
17          the constitution. There is none specific for  
18          Europe, there is none specific for Canada and  
19          there's none specific for United States.

20          Q. Okay. Can you describe for me the --  
21          the PCNI logo -- or, I'm sorry, the -- the  
22          trademark at issue in this dispute here that  
23          we're discussing today? Can you just  
24          describe it to me?

25          A. I don't understand what it is you

1 need.

2 Q. The trademark at issue here, can you  
3 tell me what it looks like?

4 A. It's our name and the three rings.

5 Q. Okay. And the -- the trademark that  
6 we're here discussing today, has that been  
7 used by PCNI branches in the United States  
8 before 2010?

9 A. Since 1990. Since 1990, sorry.

10 Q. 1990?

11 A. Yes. It's been used in United States  
12 since May 26, 1990. That is the first time  
13 it was used, and it's been consistently used  
14 since then by all our branches.

15 Q. And that includes the petitioner  
16 branches?

17 A. Yes. It includes Miami, Princeton  
18 Junction and Chicago. It's included them  
19 until they're no longer --

20 (Reporter clarification.)

21 A. It's included them until they -- they  
22 were delisted.

23 Q. In 2013, the -- I believe you  
24 testified the leadership core group selected  
25 you to register the trademark with the United

1 States patent and trademark office; is that  
2 correct?

3 A. That's not correct.

4 MR. SWYERS: Objection as to the  
5 testimony. That's mischaracterizing the  
6 testimony --

7 BY MR. TAYLOR:

8 Q. Okay. Can you --

9 MR. SWYERS: -- as to the year, just  
10 to let you know.

11 BY MR. TAYLOR:

12 Q. Okay. Can you tell me what year --  
13 can you tell me the process of registering  
14 this trademark and your involvement in it?  
15 The trademark meaning the mark that we're  
16 here discussing in the Petition to Cancel --

17 A. The initial application was -- we  
18 explored the need to do it in 2010, in  
19 August. I contacted Mr. Ibezim, the  
20 attorney. He, in turn, contacted Klauber &  
21 Jackson, and he got back to me and told me  
22 that Klauber & Jackson will be able to do  
23 that. He asked me, send in a check. I sent  
24 him a check, of which you -- which you have a  
25 copy of. And in October 2010, October two

1 thousand -- October 29, 2010, I signed a  
2 contract with Klauber & Jackson to pursue the  
3 application of our trademark.

4 My impression was it was going to  
5 take some years to -- to do that. I've never  
6 done this before. I did not hear anything.  
7 There was an SEG meeting. Somebody at the  
8 SEG meeting inquired into the status of our  
9 application. My response was I didn't know,  
10 I was going to go back and check. And when I  
11 checked, I found out that the Klauber &  
12 Jackson wasn't doing anything about that  
13 trademark application.

14 I looked for another lawyer, and  
15 that's how I find my current lawyer. I filed  
16 application through my current lawyer.  
17 That's what happened.

18 Q. Okay. Did anybody at PCNI ask you to  
19 file the trademark application through  
20 Mr. Swyers?

21 A. No. I'm the one that hired him. I  
22 already have the authority to do that. I'm  
23 the one to look for a lawyer and hire a  
24 lawyer. I hired the first one, he didn't  
25 work, and I hired Mr. Swyers.

1 Q. All right.

2 MR. TAYLOR: Matt, I have here P-1  
3 that I'm going to show --

4 MR. SWYERS: Thank you.

5 MR. TAYLOR: -- to Dr. Mgbako.

6 BY MR. TAYLOR:

7 Q. Here you go, Dr. Mgbako. This is  
8 what's been marked as P-1, and this is the  
9 trademark application in this matter.

10 And are you familiar with this  
11 document?

12 A. Yes, I am.

13 Q. Okay. And what was your involvement  
14 in the preparation of this document?

15 A. I provided the information to my  
16 attorneys to file the application.

17 Q. Okay. And did you review this  
18 document before it was filed with the United  
19 States Patent and Trademark office?

20 A. Yes.

21 Q. And did you confirm that everything  
22 in this application was true and accurate?

23 A. I did.

24 Q. I want to bring your attention to the  
25 last two pages of the stapled sheet -- of the

1 stapled exhibit. And these two documents  
2 appear to be letterhead -- well, I'm sorry.

3 The first page that you're looking at  
4 there is the trademark, correct?

5 A. Yes.

6 Q. And that's the -- the three rings  
7 with the name Peoples Club of Nigeria  
8 International?

9 A. Yes.

10 Q. Okay. And I would like you to turn  
11 the page to the -- to the last sheet. And  
12 can you describe to me what that -- what this  
13 is?

14 A. It's the -- it's the same as the one  
15 before, but more information. It says:  
16 Registered in Nigeria, registered in United  
17 States, registered in United Kingdom,  
18 registered in Canada.

19 Q. And can you confirm for me, are the  
20 petitioner branches identified on this  
21 document?

22 A. They are. Miami is identified,  
23 Princeton Junction is identified, and Chicago  
24 is identified.

25 Q. And are you aware that -- I want to

1 bring your attention to let's -- it's not --  
2 it's not Bates-stamped, so turn to the -- the  
3 sixth page of the stapled sheet. And I want  
4 to bring your attention to a "Declaration"  
5 section.

6 A. This one?

7 Q. The page before that. It says -- do  
8 you see the word "Declaration" about halfway  
9 down?

10 A. Yes.

11 Q. And do you understand that you  
12 provided your attorney with information that  
13 you -- that the registrant, PCNI, Inc., had  
14 the exclusive use to use this mark in  
15 commerce, to the best of your knowledge or  
16 belief?

17 A. Yes.

18 Q. And as you sit here today, do you  
19 still believe that that is accurate  
20 information?

21 A. It's accurate information, except, if  
22 you look at the letterhead you showed me,  
23 since I -- since this was filed, Princeton  
24 Junction, Chicago and Miami are no longer  
25 legitimate branches, and the letterhead was

1 revised to reflect that. That's the only  
2 difference --

3 Q. Okay. I want --

4 A. -- as I sit here today.

5 Q. Okay. Well, I'm going to bring --  
6 we'll -- we're going to -- we'll discuss that  
7 now.

8 MR. TAYLOR: Matt, I have what's  
9 marked as P-2, and I'm going to hand that  
10 to -- to Dr. Mgbako now.

11 BY MR. TAYLOR:

12 Q. Okay. Dr. Mgbako, take a look at  
13 that document there. Are you familiar with  
14 this document?

15 A. Yes. Yes.

16 Q. And did you review the -- were you  
17 responsible for providing the information  
18 contained in this document to your attorney?

19 A. Yes.

20 Q. And you reviewed it prior to it being  
21 filed with the United States Patent and  
22 Trademark office?

23 A. Yes, I did.

24 Q. Okay. And I want to bring your  
25 attention to the last page of the stapled

1 document. And can you describe to me what  
2 this page is?

3 A. It is our letterhead, the revised  
4 letterhead, this revised letterhead.

5 Q. Did you create this?

6 A. I created this in 2004, yes, I did.

7 Q. And, I'm sorry, when did you create  
8 this?

9 A. 2014.

10 Q. Okay. And approximately do you know  
11 which month?

12 A. Probably, I think, March or April,  
13 when Mr. Swyers, my -- if -- you want me to  
14 go on?

15 Q. Yes, please.

16 MR. SWYERS: Well, I was just going  
17 to say, just -- just a quick objection,  
18 and actually an advisory, if I may, to  
19 stay away from the attorney-client  
20 privilege. So if we want to ask, you  
21 know, structured questions, that would be  
22 fine. But let's just be very careful,  
23 because I know this involves some very  
24 tricky issues around the attorney-client  
25 issues. And obviously you guys are

1 entitled to, you know, know how these  
2 documents were created, et cetera, et  
3 cetera. Any specific advice our office  
4 may have given him though would still be  
5 protected. So if we could please dance  
6 around that gingerly, it would be greatly  
7 appreciated so I don't have to reassert  
8 the privilege. Thank you.

9 MR. TAYLOR: Understood. Understood.

10 BY MR. TAYLOR:

11 Q. Yeah, and I don't want you to say  
12 anything that Mr. Swyers might have told you  
13 directly or that you might have said to him  
14 directly?

15 A. Okay. The -- the first letterhead  
16 contained the names of the three dissolved  
17 branches. That was created before the  
18 dissolution of the branches. The branches --  
19 this was filed in November 2013. The  
20 branches were dissolved December 20, 2013.  
21 The second one reflects the accurate listing  
22 of the branch in 2014. That's the only  
23 difference where the three dissolved branches  
24 do not appear here. At the time the second  
25 letterhead was created, the branches were

1 dissolved by the annual general meeting. A  
2 letter to that effect was issued through the  
3 internet to all branches January 17, 2014,  
4 and this was created after that. That is the  
5 difference.

6 Q. Okay. Dr. Mgbako, are you familiar  
7 with Mr. Ndubizu, who's seated to my left?

8 A. Yes.

9 Q. Okay. And how are -- how do you know  
10 him?

11 A. He's -- he's the chairman -- he was  
12 the chairman of Princeton Branch.

13 Q. Okay. To be clear, he was the  
14 chairman of?

15 A. He was the chairman of Princeton  
16 Branch, he was a member of Peoples Club, he  
17 was appointed a matron -- a patron, but he's  
18 also been expelled from Peoples Club. He's  
19 no longer a member.

20 Q. Okay. And just so we're clear, at  
21 some point did Mr. Ndubizu become a member of  
22 PCNI Princeton Junction, to your knowledge?

23 A. Yes, he -- he became a member of  
24 Princeton Junction.

25 Q. And when -- do you know approximately

1 when that was?

2 A. When it was created.

3 Q. And when was that?

4 A. I know about two -- it was  
5 inaugurated 2007.

6 Q. Okay. So prior to 2007 he was the  
7 chairman of the PCNI Princeton organization?

8 A. He was the inaugural chair, he was  
9 the one that created the branch.

10 Q. Okay. And when --

11 A. He's the one that founded the chair.

12 Q. And do you know what year that was?

13 A. I think it was 1998, if I remember  
14 correctly. He was inaugurate chair.

15 Q. All right. Okay.

16 MR. TAYLOR: Matt, I have here what's  
17 marked as P-20 I'd like to show  
18 Dr. Mgbako.

19 MR. SWYERS: Thank you.

20 BY MR. TAYLOR:

21 Q. Okay. Doctor, I've handed you what's  
22 shall marked as P-20 bearing Bates stamp  
23 Petitioner 0258.

24 Have you ever seen this letter?

25 A. No, I've never seen this letter.

1 Q. Okay. Are you aware that Mr. Ndubizu  
2 was appointed as the permanent agent of  
3 Peoples Club of Nigeria International?

4 A. No.

5 Q. Okay.

6 MR. SWYERS: And again, I'd object on  
7 the grounds of authenticity, foundation,  
8 and we're going to throw in a hearsay on  
9 this one as well. Thank you.

10 BY MR. TAYLOR:

11 Q. At some point in time did you ever  
12 communicate with Mr. Ndubizu regarding the  
13 operations of PCNI, Inc.?

14 A. No.

15 Q. Did you ever send him a Certificate  
16 of Incorporation for PCNI, Inc.?

17 A. Certificate of Incorporation?

18 Q. Did you ever send Mr. Ndubizu the  
19 PCNI, Inc. Certificate of Incorporation?

20 A. No.

21 Q. Did you ever send him any tax  
22 information?

23 A. I don't remember doing that.

24 Q. Okay.

25 A. I did not incorporate PCNI on

1 September 21st prior to this. I mean not --  
2 sorry, sorry. No, no. I'm not familiar with  
3 this letter. I misspoke, yeah.

4 Q. Okay.

5 MR. TAYLOR: Okay. I have here  
6 what's been marked as P-21 that I'd like  
7 to show Dr. Mgbako.

8 BY MR. TAYLOR:

9 Q. There you go, Doctor. I've  
10 showed you -- handed you a document  
11 entitled -- captioned P-21 bearing  
12 Petitioners Bates stamp 0182.

13 Have you seen this document before?

14 A. No, never seen this.

15 Q. Okay. Are you aware that Mr. Ndubizu  
16 is the registered agent for PCNI, Inc.?

17 A. Not -- not -- not the one in New  
18 Jersey -- not the one in -- this may be  
19 Princeton Junction. I'm -- I'm not aware of  
20 this.

21 Q. Okay. Do you see the -- okay, strike  
22 that.

23 Okay. To your knowledge, is  
24 Mr. Ndubizu responsible for filing the annual  
25 tax return with the department -- the New

1 Jersey Department of Treasury?

2 A. He is not.

3 Q. He's not.

4 Who -- who is responsible for that?

5 A. My accountant.

6 Q. Does Mr. --

7 MR. SWYERS: And if I may ask for  
8 clarification, for which entity?

9 MR. TAYLOR: For PCNI, Inc., the New  
10 Jersey registered entity.

11 A. No. He has nothing to do with that.

12 BY MR. TAYLOR:

13 Q. So you have no knowledge of  
14 Mr. Ndubizu's role as an agent of PCNI, Inc.?

15 A. No. He's not.

16 MR. TAYLOR: All right. Can we take  
17 a, like, quick break? I think I'm getting  
18 to the very -- to the end here, Matt.

19 MR. SWYERS: Yeah, that's -- that's  
20 fine. Whatever y'all need. I mean this  
21 is, you know -- I'm sorry. We're off the  
22 record, right?

23 (Brief recess.)

24 MR. TAYLOR: All right. So, Matt, I  
25 don't -- I don't think that I have any

1 other questions.

2 I know you do here, and I have your  
3 documents sitting next to me, so I don't  
4 know if you want to go ahead.

5 MR. SWYERS: Yeah, that's -- I will.  
6 I am ready.

7 EXAMINATION OF MR. MGBAKO BY MR. SWYERS:

8 Q. Doctor, you know, we've spoken a lot  
9 about the Peoples Club of Nigeria, but I just  
10 have a couple questions for you to -- to  
11 clarify some things for me, if you don't  
12 mind.

13 First of all, what is the Peoples  
14 Club of Nigeria?

15 A. It's a social organization. It's a  
16 social club.

17 Q. Okay. And why was it founded?

18 A. For get together, networking,  
19 providing charity work to -- to the -- to the  
20 indigents, and helping themselves.

21 Q. Okay.

22 MR. SWYERS: If I could ask that what  
23 I marked as Exhibit 1 be placed in front  
24 of the witness. It should be a four-page  
25 document with just a simple white exhibit

1 sticker, well, marked 1, Bates-stamped  
2 number 30, 31, 32, 33. Let me know when  
3 that's in front of the witness.

4 MR. TAYLOR: It is. That's been  
5 done.

6 MR. SWYERS: Oh, thank you.

7 BY MR. SWYERS:

8 Q. Doctor, do you recognize this  
9 document?

10 A. Yes.

11 Q. Okay. Could you tell us what this  
12 is, please?

13 A. Okay. The author of the letter is  
14 Chief C.H. Obioha, who was the national  
15 president of Peoples Club of Nigeria  
16 International. And this letter was issued  
17 for the inauguration of the first year  
18 anniversary of the Houston branch of Peoples  
19 Club of Nigeria, which was on Saturday,  
20 May 25, 1991.

21 Q. And the Houston branch was the first  
22 U.S. branch of Peoples Club of Nigeria,  
23 correct?

24 A. Yes.

25 Q. Okay. And, in general, does this

1 give sort of a nice, I guess, basis for the  
2 Peoples Club of Nigeria, of why it exists?

3 A. Yes, it does.

4 Q. Okay. And is this a true and  
5 accurate copy of that document?

6 A. Yes, it is.

7 Q. Okay.

8 MR. SWYERS: We'll move that into the  
9 record.

10 BY MR. SWYERS:

11 Q. Now, did there come a time that the  
12 Peoples Club of Nigeria decided to expand  
13 into the U.S.?

14 A. Yes.

15 Q. And I think we sort of know the  
16 answer by now, but still, why? Do you know?

17 A. Many, many Nigerians who are living  
18 outside -- outside Nigeria at that time.

19 Q. Okay. And if you could take a look  
20 at what I marked as Exhibits 2 and 3.

21 A. Yes.

22 Q. Tell us what these are, please?

23 A. These are articles in The Three  
24 Rings, which was a paper of the club, a  
25 written paper of the club.

1 Q. Okay. And are these true and  
2 accurate copies of those articles?

3 A. Yes.

4 Q. Okay.

5 MR. SWYERS: I'll move those two into  
6 evidence.

7 BY MR. SWYERS:

8 Q. We've touched on how the club is run,  
9 but tell us a little bit more about this  
10 Central Executive Committee for my purposes.  
11 Does it effectively run the organization?

12 A. Yes. It's -- the Executive Committee  
13 is responsible to make --

14 (Reporter clarification.)

15 A. The Central Executive Committee makes  
16 decisions relevant to all branches,  
17 international and national. They run the  
18 club.

19 Q. Are those decisions also -- would,  
20 you know, part of those decisions be the  
21 excommunication or dissolution of a branch?

22 A. Yes.

23 Q. Okay. Would they also be if you  
24 wanted to found a new branch or subsidiary?

25 A. Yes.

1 Q. Okay. Now, did there come a time --  
2 well, first of all, and again for the record,  
3 who makes up the Central Executive Committee?

4 A. It's the president, the chairman of  
5 all branches, patrons and trustees.

6 Q. Okay. Now, did there come a time  
7 that the Central Executive Committee met in  
8 Houston in 2010?

9 A. Yes.

10 Q. Okay. And as a result of that, what,  
11 if any, directives did the Central Executive  
12 Committee give to you at that meeting?

13 A. Establish a club, a subsidiary of the  
14 club in the United States, apply for  
15 trademark for the club, and establish a 501c3  
16 company for charity work.

17 Q. Okay. And was this -- this is in  
18 2010, correct?

19 A. Yes, correct.

20 Q. And did you, as a result of that  
21 directive, do those three things?

22 A. I've done the two. The three is  
23 still in process, converting to 501c3.

24 Q. Okay. Now, who, if you know,  
25 generally, if you recall, the names of any of

1 the Central Executive Committee members that  
2 were present at that meeting; do you recall  
3 any of them?

4 A. Yes.

5 Q. Can you please tell us?

6 A. Fabian Onwuachu, Fabian, F-a-b-i-n,  
7 Onwuachu, O-n-w-u-a-c-h-u; Desmond Ogugua,  
8 D-e-s-m-o-n-d, Ogugua, O-g-u-g-u-a; Fidelis  
9 Okekearu, O-k-e-k-e-a-r-u; Joseph Ilonze,  
10 I-l-o-n-z-e; Sam Iwuchukwu, Sam, S-a-m,  
11 Iwuchukwu, I-w-u-c-k-w-u; Professor Innocent  
12 Aluka, A-l-u-k[verbatim]; Chief Ojukwuike,  
13 O-j-u-k-w-u-i-k-e; and of course myself.

14 Q. Okay. Was there anyone else at the  
15 meeting that you can remember?

16 A. There were other people who are  
17 patrons of the -- or chairs of the club that  
18 I -- I don't remember.

19 Q. Okay. Now, specifically, do you  
20 remember whether or not a gentleman by the  
21 name of Mr. it's Ndubizu -- I believe he's in  
22 the room with you today -- was he there at  
23 the meeting?

24 A. No.

25 Q. Okay. How about a Dr., and again ill

1 spell it, U-k-e-j-e, from the Chicago branch,  
2 was he there?

3 A. No.

4 Q. Okay. Have you heard of these two  
5 men?

6 A. Yes.

7 Q. Of course.

8 One is in the room with you now,  
9 right?

10 A. Yes.

11 Q. But you can confirm they were not at  
12 this Houston meeting, correct?

13 A. They were not there, no.

14 Q. Okay. Can I direct your attention to  
15 Exhibit No. 4, please. Let me know when you  
16 have it in front of you.

17 A. I have it.

18 Q. Can you identify this for the record,  
19 please?

20 A. I do.

21 Q. What is this?

22 A. It's a letter written to me by Chief  
23 Ilonze, who is the president of the club, and  
24 Honorable Ebere, E-b-e-r-e, who is the  
25 national secretary of the club. It's

1 information --

2 Q. And --

3 A. -- about Peoples Club of Nigeria.

4 Q. Okay. And you testified just moments  
5 ago he was -- Chief Ilonze was actually at  
6 the meeting in Houston we're speaking of; is  
7 that correct?

8 A. Yes, he was there.

9 Q. Okay. Can you see in the top right,  
10 what's the date of this letter?

11 A. October 25, 2014.

12 Q. Now, was Chief Ilonze the president  
13 of PCNI as of that date?

14 A. Yes.

15 Q. Okay. And generally tell us what is  
16 the subject and what is this letter saying?  
17 What does it say?

18 A. It says that the club is a social  
19 club registered in Nigeria, with branches in  
20 Nigeria, Canada, United Kingdom and United  
21 States of America. Each branch is organized  
22 under a charter granted by PCNI authorities  
23 in Nigeria. When a charter is withdrawn,  
24 such a branch ceases to exist regardless of  
25 their registration status where they operate.

1 The club has the right to dissolve offending  
2 executives and appoint Caretaker Committees  
3 when appropriate.

4 The club is a subsidiary -- no. The  
5 club in New Jersey is a subsidiary of Peoples  
6 Club of Nigeria International registered in  
7 Nigeria. The Peoples Club of Nigeria  
8 International New Jersey operates under the  
9 constitution of Peoples Club of Nigeria  
10 registered in Nigeria. The branches of  
11 Peoples Club in the U.S. report directly to  
12 the authorities in Nigeria.

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

18 Q. Do you agree with the statements in  
19 this letter?

20 A. I totally agree.

21 Q. Okay. Okay. Is it a true and  
22 accurate copy of the letter, to the best of  
23 your knowledge?

24 A. It's correct, yes.

25 Q. Okay.

1 MR. SWYERS: So I will move that in.

2 BY MR. SWYERS:

3 Q. Referencing Exhibit 5, if you could  
4 kindly tell us what this is?

5 A. A letter to me dated July 14, 2014,  
6 from Dr. Ilonze, the national president, and  
7 Honorable Ebere, E-b-e-r-e, the general  
8 secretary.

9 Q. Okay. And so the -- the second  
10 paragraph of this, which begins actually with  
11 your, you know, your name, what does the  
12 second paragraph say?

13 A. Dr. Mgbako is hereby granted full  
14 authority to prosecute any infringement of  
15 this trademark by unauthorized users.

16 Q. Okay. And at the top of the letter  
17 it references a U.S. Serial Number. Do you  
18 know to what that refers?

19 A. It refers to our trademark.

20 Q. Okay. And if I could then ask you to  
21 reference what has been designated  
22 by opposing counsel Exhibit P-1, if I'm not  
23 mistaken. Yes, P-1.

24 Can you compare on the top of Exhibit  
25 P-1 --

1           A.     This one?

2           Q.     -- the serial number --

3                   MR. TAYLOR:  It's the application.

4  BY MR. SWYERS:

5           Q.     -- to the serial number in what I'm  
6  asking you to look at Exhibit 5?

7           A.     Okay, the application number.  Yeah,  
8  it's the same.

9           Q.     Correct.  Okay.

10                   And is this the application that  
11  ultimately matured into a registration?

12          A.     Yes.

13          Q.     And that's the registration that  
14  we're sitting here today, you know,  
15  discussing; is that correct?

16          A.     That's correct.

17          Q.     Okay.  Is this a true and accurate  
18  copy of this letter?

19          A.     Yes.

20          Q.     Okay.

21                   MR. SWYERS:  I'll move that into  
22  evidence as well.

23  BY MR. SWYERS:

24          Q.     We've spoken a lot about this logo  
25  that has been applied for, which is the

1 subject of Serial Number 86116372, the  
2 subject registration as we'll now call it.  
3 Do you know when it was created?

4 A. At the foundation of the club in  
5 1990 -- I mean 19 --

6 Q. Well --

7 A. -- 1971.

8 Q. -- when was the actual logo created  
9 with the -- the rings?

10 A. Yeah, 1971.

11 Q. Okay. So would it be fair to say  
12 that it existed prior to the existence of the  
13 three petitioner's branches?

14 A. Yes.

15 Q. Okay. So none of them, we can agree,  
16 created this logo; would you agree with me?

17 A. None -- I agree with you.

18 Q. Okay. One moment, just checking my  
19 notes.

20 The logo was created and recently  
21 owned by the Peoples Club of Nigeria, the  
22 main branch in Nigeria; is that correct?

23 A. That's correct.

24 Q. The main -- the main organization.

25 And then so the first use of that

1 logo would have been with the permission of  
2 Nigeria by the Houston branch; is that also  
3 correct?

4 A. The first use of the logo in United  
5 States?

6 Q. Correct, um-hmm.

7 A. Yes, Houston would not use it without  
8 a permission from Nigeria.

9 Q. And the meeting that we've spoken  
10 about in 2010, the Houston meeting by the  
11 Executive Committee, the Central Executive  
12 Committee, the Central Executive Committee  
13 determined that the rights to that logo  
14 should be held by the new subsidiary formed  
15 by you and then registered by you on behalf  
16 of that new subsidiary, that's correct?

17 A. That's correct, yes.

18 Q. Okay. I don't think that we've  
19 spoken about it yet, but are the three  
20 petitioner branches, have they been expelled  
21 from the club?

22 A. They've been expelled from the club,  
23 yes.

24 Q. Okay. Why?

25 A. The club made a decision to expel

1 them based on the fact that they did not do  
2 what they were supposed to do. Dr. Ndubizu  
3 and some of them --

4 (Reporter clarification.)

5 A. Dr. Ndubizu,  
6 N-d-u-b-u-i-z-u[verbatim] filed a law court  
7 in Nigeria -- a law -- a lawsuit in Nigeria  
8 against the club, and the consequence of that  
9 was the need for the club to verify from all  
10 branches their status in -- in relationship  
11 to that application -- to that lawsuit. The  
12 three branches that were dissolved did not  
13 cooperate. The executive were initially  
14 dissolved, a Caretaker Committee was supposed  
15 to be appointed. They did not cooperate with  
16 the appointment of the executive -- the  
17 Caretaker Committee --

18 (Reporter clarification.)

19 A. -- and as a consequence of that the  
20 annual general meeting, December 20, 2013,  
21 dissolved the branches.

22 Q. All right. And so at that juncture,  
23 when PCNI Nigeria and the Executive Committee  
24 in general dissolved these three branches,  
25 were they considered no longer part of PCNI?

1           A.     They're -- yes, they're considered no  
2 longer part of PCNI.

3           Q.     Okay. Within that context you've  
4 already testified that you were then charged  
5 with the enforcement of the trademark rights  
6 for the entire organization; is that correct?

7           A.     That is correct.

8           Q.     Okay. And did there come a time that  
9 you ever issued letters warning others of  
10 their improper use of the trademark?

11          A.     That's correct.

12          Q.     Okay. Can I reference you to  
13 Exhibit 8, please. Can you tell us what  
14 Exhibit 8 is?

15          A.     It is a letter written by me dated  
16 February 18, 2013. It's Public Notice and  
17 Warning regarding the violation of the  
18 trademark of Peoples Club of Nigeria  
19 International by the dissolved Chicago  
20 Branch.

21          Q.     Okay. Is this a true and accurate  
22 copy of that?

23          A.     That's a true and accurate copy of  
24 what I wrote.

25          Q.     Okay.

1 MR. SWYERS: We'll move that in as  
2 well.

3 And bear with me because I just have  
4 a few more cleanup items. I just want to  
5 make sure I do them as concisely as  
6 possible.

7 BY MR. SWYERS:

8 Q. I want to return your attention to  
9 some questions that opposing counsel asked  
10 you about your prior law firm, Klauber &  
11 Jackson. It was your understanding that in  
12 2010 you retained that law firm to file for  
13 the trademark on behalf of PCNI; is that  
14 correct?

15 A. That's correct.

16 Q. And, to the best of your knowledge,  
17 they actually did file for that trademark,  
18 didn't they?

19 A. I actually don't know what they did.  
20 I paid them.

21 Q. Okay.

22 A. I paid them. I don't know what  
23 happened.

24 Q. Okay. Was there any possibility --  
25 well, strike that.

1           Were you under the impression that  
2 they filed for the trademark, but then the  
3 trademark received an office action to which  
4 they didn't respond so it, therefore, died?

5           A.     That's what I -- what I heard from --  
6 from them when I inquired.

7           Q.     Okay. And then following, you know,  
8 that -- well, about when did you determine  
9 that had occurred; was it in 2013?

10          A.     2013, yes.

11          Q.     And would it be fair to say that then  
12 following that you sought out other counsel  
13 to then complete your directive of  
14 registering the trademark for PCNI?

15          A.     That's correct.

16          Q.     And my office happened to be that  
17 other counsel?

18          A.     That's correct.

19          Q.     And forgive me, perhaps I didn't ask  
20 this question. Regarding the expelled  
21 chapters, the three that are the petitioners  
22 here, once expelled are they allowed to  
23 continue to use the trademarks of PCNI?

24          A.     No, they are not allowed to.

25          Q.     Okay. In the trademark application

1 there is a claimed date of first use of 1994.  
2 Is it your and PCINI's -- excuse me, PCINI --  
3 excuse me, Peoples Club of Nigeria's  
4 contention that that date of use comes from  
5 the Houston branch?

6 A. Yes. That's correct because they're  
7 the established use. Although they were  
8 founded --

9 (Reporter clarification.)

10 A. I said that's the dates we considered  
11 that as established use, although they've  
12 been using it since 1990, but they were able  
13 to, you know, to change, have a new election,  
14 so the brand did not die, so it continued.

15 Q. And so the subsidiary that you formed  
16 effectively was to hold the intellectual  
17 property as ordered by the executive  
18 committee that we've spoken about?

19 A. Yes.

20 Q. Okay. But the use comes from use by  
21 the recognized branches?

22 A. Yes.

23 Q. All right. As -- and all of this was  
24 ordered by the senior executive committee or  
25 the -- or the executive committee, correct?

1 A. That's correct, yes.

2 Q. Okay. Opposing counsel questioned  
3 you about the specimens of use that were  
4 supplied to my office by you, and  
5 specifically two pieces of letterhead. And  
6 if you need to, all right, the reference  
7 number or the Exhibit number is P-2.

8 You testified that the second  
9 specimen which was submitted was -- which was  
10 the amended letterhead -- well, it was -- was  
11 amended letterhead. Was that specimen though  
12 actually used in commerce? Were you using  
13 that actually as letterhead as of the date  
14 you provided it to my office?

15 A. The amended?

16 Q. Yes.

17 A. Yes.

18 Q. Okay.

19 MR. SWYERS: Can we go off the record  
20 for a brief moment?

21 (Off-the-record discussion.)

22 MR. SWYERS: Back on the record. I  
23 have nothing further at this time.

24 MR. TAYLOR: Okay. I just have one  
25 quick follow-up question that I'd like to

1 ask.

2 EXAMINATION OF MR. MGBAKO BY MR. TAYLOR:

3 Q. Dr. Mgbako, I believe you testified  
4 that PCNI, Incorporated, the New Jersey  
5 entity, was formed for the purpose of holding  
6 intellectual property of PCNI; is that  
7 correct?

8 A. A trade name, yes.

9 Q. Okay. And my question is: Do you  
10 have any knowledge or are you aware of any  
11 assignment of any intellectual property to  
12 PCNI New Jersey -- PCNI, Inc. New Jersey?

13 A. I don't understand your question.

14 Q. Are you aware if there are any  
15 documents that show an assignment of  
16 intellectual property rights to PCNI,  
17 Incorporated New Jersey?

18 A. I don't understand what you mean by  
19 assignment of property rights.

20 Q. Of intellectual property rights.

21 A. Yeah.

22 Q. Are you aware of whether an entity  
23 formally -- strike that.

24 So you testified that PCNI, Inc. New  
25 Jersey held intellectual property, namely the

1 trademark that we are here discussing today.  
2 Who held the -- what entity held the  
3 trademark rights prior to PCNI, Inc. New  
4 Jersey?

5 A. Trademark?

6 Q. Yes.

7 A. The trade -- the first time trade --  
8 you mean a registered trademark --

9 Q. Yes.

10 A. -- or you're talking about the name?

11 Q. Registered trademark.

12 A. That's the first time it was being  
13 registered.

14 Q. Okay. Was it ever registered in  
15 Nigeria that you're aware of?

16 A. Not as a trademark, but it's now  
17 registered, yes. It's registered in Nigeria  
18 as Peoples Club of Nigeria International.  
19 But if you're talking about trademark, yeah,  
20 trademark. The trademark is now registered  
21 so we protect the name.

22 Q. Okay.

23 MR. TAYLOR: Mr. Swyers, I don't have  
24 any other questions.

25 Just one other thing though. I just

1 want to move the different exhibits that  
2 we have marked into evidence subject, of  
3 course, to the various objections that  
4 you've made along the way to each  
5 individual document.

6 MR. SWYERS: Yeah, I mean I have no  
7 objection to them all being attached,  
8 subject to the objections that I've  
9 preserved throughout the record.

10 MR. TAYLOR: Okay. I don't -- I  
11 think that I'm -- we're done here. I  
12 don't know if you have any other further  
13 questions.

14 MR. SWYERS: I am finished, so we're  
15 off the record.

16 (Witness excused.)

17 (Testimony concluded at 12:36 p.m.)

18

19

20

21

22

23

24

25

C E R T I F I C A T E

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

I, Heather L. Ashton-Chee Wah, Notary Public, Commissioner of Deeds, and Certified Court Reporter of the State of New Jersey, do hereby certify that prior to the commencement of the examination,

was duly sworn by me to testify to the truth, the whole truth and nothing but the truth.

I do further certify that the foregoing is a true and accurate transcript of the testimony as taken stenographically by and before me at the time, place and on the date hereinbefore set forth.

I do further certify that I am neither a relative nor employee nor attorney nor counsel of any of the parties to this action, and that I am neither a relative nor employee of such attorney or counsel and that I am not financially interested in this action.

DEC 11 2015

  
HEATHER L. ASHTON-CHEE WAH, C.C.R.  
Certificate No. XI01936  
Notary Public  
Date: .

<b>A</b>	90:15,16,17	<b>applied</b> 49:16 55:20 89:25	<b>August</b> 33:7 34:25 36:10,17 37:6 38:5 40:11 41:2 66:19	<b>begins</b> 88:10
<b>able</b> 63:4,19 66:22 96:12	<b>agreed</b> 40:19	<b>applies</b> 55:17,21 57:3 59:23	<b>authentic</b> 61:14	<b>behalf</b> 39:14,14 91:15 94:13
<b>accept</b> 28:11	<b>ahead</b> 49:24 53:21 79:4	<b>apply</b> 28:8 29:1 35:7,13 52:20 55:20 64:10 83:14 87:15	<b>authenticity</b> 47:24 48:12,17 53:22 54:8 61:22 63:4 76:7	<b>belief</b> 70:16
<b>accepted</b> 28:6 49:22 59:21	<b>ahold</b> 46:7	<b>appoint</b> 27:8 87:2	<b>author</b> 80:13	<b>believe</b> 19:2 31:12 32:15 47:8 48:21 61:12,13 65:23 70:19 84:21 98:3
<b>account</b> 19:9,13	<b>Alhaji</b> 42:22	<b>appointed</b> 27:3,4,6 50:20 74:17 76:2 87:14 92:15	<b>authorities</b> 86:22 87:12	<b>belong</b> 15:25
<b>accountant</b> 78:5	<b>allegiance</b> 28:16 50:21	<b>appointment</b> 92:16	<b>authority</b> 48:23 67:22 88:14	<b>belongs</b> 28:18,19
<b>accounts</b> 19:11	<b>allowed</b> 55:23 95:22,24	<b>appreciated</b> 73:7	<b>authorized</b> 87:15	<b>Benefits</b> 62:15
<b>accurate</b> 68:22 70:19,21 73:21 81:5 82:2 87:22 89:17 93:21,23 101:11	<b>Aluka</b> 34:13,14,15 35:9 84:12	<b>appropriate</b> 87:3	<b>Avenue</b> 2:9	<b>best</b> 70:15 87:22 94:16
<b>Acknowledgement</b> 4:16	<b>Ambrose</b> 1:16 7:3 87:13 101:7	<b>approximately</b> 72:10 74:25	<b>aware</b> 41:13 48:7 57:15 61:2 69:25 76:1 77:15,19 98:10,14,22 99:15	<b>bit</b> 18:25 19:25 20:21 25:25 41:8 82:9
<b>act</b> 52:1	<b>amended</b> 97:10,11 97:15	<b>April</b> 72:12	<b>Ashton-Chee</b> 1:20 101:3,23	<b>BOARD</b> 1:1
<b>acting</b> 59:13	<b>America</b> 11:13 86:21	<b>articles</b> 81:23 82:2	<b>asked</b> 39:9 40:22 49:23 66:23 94:9	<b>bottom</b> 31:22 36:7 38:2 47:13
<b>action</b> 4:5 95:3 101:18,21	<b>amount</b> 38:14	<b>Ashton-Chee</b> 1:20 101:3,23	<b>asking</b> 89:6	<b>branch</b> 1:6,6,7 4:15 5:13 15:25 16:1,2 16:9,14,17 17:18 17:24 21:7,13,14 21:18 22:8,13,17 22:18,20,25 23:5 23:12,15 24:5,7,8 24:12,17,19,22,23 25:7,13,18 28:6,9 28:11,14,19,20,23 28:25 30:2,5,9,10 30:12,13 35:1,16 47:3,4,5 49:2,4,6 49:11,14,16,17,23 50:5,13,14,24 51:2,3,4,14,17,21 51:23 52:5,7,12 52:12,18,20 54:3 54:9 55:23 57:4,6 57:7,13,13,17 58:2,15,18,21 59:5,16 60:12 64:11 73:22 74:12 74:16 75:9 80:18 80:21,22 82:21,24 85:1 86:21,24 90:22 91:2 93:20
<b>actions</b> 19:18 36:14	<b>Anambra</b> 13:10 14:24	<b>ask</b> 59:9,10	<b>a.m</b> 1:20	
<b>active</b> 51:12 52:9	<b>anniversary</b> 80:18	<b>assignment</b> 98:11 98:15,19	<b>B</b>	
<b>activities</b> 35:17	<b>annual</b> 16:22 17:3 25:8 57:20 58:8 74:1 77:24 92:20	<b>assumes</b> 51:2	<b>B 4:1</b> 5:1	
<b>actual</b> 48:14 90:8	<b>annually</b> 25:11	<b>assure</b> 30:13 50:1,5 51:3,6	<b>back</b> 17:13 30:18 39:2 41:5,6 59:24 60:5 66:21 67:10 97:22	
<b>address</b> 11:22 14:2 14:2	<b>answer</b> 8:16,17 9:14 58:24 60:7 81:16	<b>assuring</b> 24:16	<b>background</b> 10:12	
<b>advice</b> 73:3	<b>answers</b> 25:16	<b>attached</b> 100:7	<b>bank</b> 19:9,11	
<b>advisory</b> 72:18	<b>anybody</b> 16:10 30:8 67:18	<b>attend</b> 10:14 30:7 51:20 58:23	<b>based</b> 92:1	
<b>Affair</b> 63:12	<b>anyplace</b> 50:9	<b>attention</b> 31:17 62:14 68:24 70:1 70:4 71:25 85:14 94:8	<b>basis</b> 57:22 81:1	
<b>affairs</b> 23:9 24:24 25:17 46:11	<b>apparent</b> 10:9	<b>attorney</b> 7:11 9:7 19:20,21 32:1 37:16,19 66:20 70:12 71:18 101:16,19	<b>Bates</b> 31:5 42:2 44:6 45:9 46:5,23 75:22 77:12	
<b>affect</b> 25:11 59:4	<b>APPEAL</b> 1:1	<b>attorneys</b> 68:16	<b>Bates-stamped</b> 5:5 5:6,8 31:19 53:11 60:23 70:2 80:1	
<b>affidavit</b> 59:7	<b>appear</b> 69:2 73:24	<b>attorney-client</b> 72:19,24	<b>bear</b> 94:3	
<b>affiliated</b> 19:3 22:17	<b>appearing</b> 9:8		<b>bearing</b> 31:4,18 38:4 42:2 44:6 45:9 46:23 53:10 75:22 77:11	
<b>afoul</b> 25:19 51:25	<b>appears</b> 32:8,10,11			
<b>agent</b> 14:3 16:17,18 16:20 17:5,6,17 19:4,5,7,14,16,19 20:25 76:2 77:16 78:14 87:14	<b>application</b> 4:4 32:11 38:12 39:11 49:18,20,21,22 66:17 67:3,9,13 67:16,19 68:9,16 68:22 89:3,7,10 92:11 95:25			
<b>agent's</b> 32:6	<b>applications</b> 16:22			
<b>ago</b> 7:23 86:5				
<b>agree</b> 45:20 49:14 49:16 87:18,20				

96:5	<b>capital</b> 52:16,17 54:2	86:22,23	51:7 52:3 54:24 55:13 58:6,24,25 59:1,8,8,10,17 60:1,4,14 61:3,16 62:16,21 64:15 69:7 74:16,18 76:3 79:9,14,16 80:15,19,22 81:2 81:12,24,25 82:8 82:18 83:13,14,15 84:17 85:23,25 86:3,18,19 87:1,4 87:5,6,7,9,11,16 90:4,21 91:21,22 91:25 92:8,9 93:18 96:3 99:18	<b>compare</b> 88:24 <b>complete</b> 95:13 <b>completed</b> 11:7 <b>completely</b> 38:24 <b>composes</b> 26:20 <b>concisely</b> 94:5 <b>concluded</b> 100:17 <b>condition</b> 20:10,12 <b>conditions</b> 27:3 51:13 <b>conference</b> 8:3 18:7 <b>confirm</b> 68:21 69:19 85:11 <b>conflict</b> 56:1 <b>consequence</b> 92:8 92:19 <b>considered</b> 92:25 93:1 96:10 <b>consistent</b> 24:17 36:16 51:4,8 59:13 60:10 61:20 <b>consistently</b> 11:16 65:13 <b>consisting</b> 34:10 <b>consists</b> 33:18 <b>constitution</b> 4:19 22:11,19 24:18 25:22 28:16 30:14 50:3,22 51:5,25 55:16,19,24,25 56:1 59:8,13 61:3 61:10,15,16 62:22 63:11,17 64:17 87:9 <b>contact</b> 27:11,16,16 27:21 29:17 40:25 41:3 <b>contacted</b> 39:1 66:19,20 <b>contained</b> 71:18 73:16 <b>contention</b> 96:4 <b>Contents</b> 62:5 <b>context</b> 93:3 <b>continue</b> 47:25 51:24 95:23
<b>branches</b> 15:24 19:10 22:4,6,12 22:13,21,24 23:2 23:2,3,4,10,10,18 23:20 27:10,15,15 27:20 28:22 29:17 42:7 48:21,22 54:14,17,19,21 55:2,6,17 56:4,11 56:16 60:9 65:7 65:14,16 69:20 70:25 73:17,18,18 73:20,23,25 74:3 82:16 83:5 86:19 87:10 90:13 91:20 92:10,12,21,24 96:21	<b>careful</b> 72:22 <b>Caretaker</b> 87:2 92:14,17 <b>case</b> 9:24 39:7,10 <b>CE</b> 26:3 <b>cease</b> 59:1 <b>ceases</b> 86:24 <b>CEB</b> 26:2 <b>CEC</b> 26:4 <b>central</b> 24:21,23 26:6 49:21 50:6 52:2 58:9 82:10 82:15 83:3,7,11 84:1 91:11,12 <b>ceremony</b> 50:13 <b>certain</b> 17:1 22:16 58:3,4 <b>certificate</b> 4:9 31:10,14 32:16,18 38:24 76:15,17,19 101:24 <b>Certification</b> 4:7 <b>Certified</b> 1:21 4:7 101:4 <b>certify</b> 101:5,10,15 <b>cetera</b> 73:2,3 <b>chair</b> 16:24 25:7,13 30:9 51:2,2 75:8 75:11,14 <b>chairman</b> 23:6 24:14,16 29:3,19 29:20,21,25 33:18 47:15 74:11,12,14 74:15 75:7 83:4 <b>chairs</b> 84:17 <b>change</b> 96:13 <b>chapters</b> 95:21 <b>charged</b> 93:4 <b>charity</b> 14:18 35:17 79:19 83:16 <b>charter</b> 50:15,15 51:1 52:7 58:14 59:21,21,23,24	<b>check</b> 4:18 38:4,4,6 38:10,13 40:10 66:23,24 67:10 <b>checked</b> 67:11 <b>checking</b> 90:18 <b>Chicago</b> 1:6 5:13 56:24 65:18 69:23 70:24 85:1 93:19 <b>Chief</b> 34:10,10,12 34:17,20 42:15,21 44:21,24 80:14 84:12 85:22 86:5 86:12 <b>citizen</b> 60:4 <b>claimed</b> 96:1 <b>clarification</b> 13:12 14:25 25:20 29:24 33:8 37:22 39:21 47:9 57:11 65:20 78:8 82:14 92:4 92:18 96:9 <b>clarify</b> 79:11 <b>clarity</b> 46:3 <b>cleanup</b> 94:4 <b>clear</b> 9:23 17:16 21:10 34:4 74:13 74:20 <b>clipped</b> 62:3 <b>closed</b> 39:7 <b>club</b> 1:4,9 4:12,14 4:16,19 5:4,12 13:16 14:14 15:17 15:22 16:2,7,17 16:20 19:15 21:2 21:7,14,21,25 22:15,18,18,20 24:18 25:6,10,12 25:18 26:23 27:5 28:17,18 29:20 30:6,14 32:24 33:4 35:3,4,6,8,14 35:16 37:12 41:16 43:17,19,20 44:12 46:1,9,12,14 49:6 49:13,19 50:21,22	<b>clubs</b> 13:7,9 14:6 15:13 18:4 <b>college</b> 10:15 <b>colorful</b> 50:12 <b>come</b> 28:14 50:8,9 81:11 83:1,6 93:8 <b>comes</b> 12:9 52:23 96:4,20 <b>coming</b> 48:14,18 <b>commencement</b> 101:6 <b>commencing</b> 1:19 <b>commerce</b> 70:15 97:12 <b>Commercial</b> 4:8 <b>committee</b> 26:6 33:19 49:22 50:7 82:10,12,15 83:3 83:7,12 84:1 91:11,12,12 92:14 92:17,23 96:18,24 96:25 <b>Committees</b> 87:2 <b>communicate</b> 76:12 <b>communication</b> 27:23 <b>Community</b> 14:9 14:11 <b>company</b> 2:8 12:16 12:17 19:8 83:16	
<b>brand</b> 96:14 <b>break</b> 78:17 <b>brief</b> 17:10 78:23 97:20 <b>briefly</b> 11:12 13:8 26:18 49:1 <b>bring</b> 30:17 31:16 62:14 68:24 70:1 70:4 71:5,24 <b>building</b> 1:18 2:3 8:2 <b>business</b> 12:24 13:1 13:5 32:16,18,21 <b>Bye-Laws</b> 4:20 61:3,16 <b>bylaws</b> 22:20 24:19 28:17 50:22 51:5 55:16,24 61:10	<b>C</b>			
<b>C</b> 2:1 101:1,1 <b>call</b> 14:9 27:25 59:16 90:2 <b>called</b> 16:1 <b>Canada</b> 23:3 64:18 69:18 86:20 <b>Cancel</b> 7:13 66:16 <b>capacity</b> 9:25				

<b>continued</b> 96:14	95:17 97:2 101:17	57:21 82:16,19,20	<b>disagreement</b> 41:14	<b>doing</b> 35:12 67:12
<b>continuing</b> 62:11	101:19	<b>Declaration</b> 70:4,8	41:17	76:23
<b>contract</b> 39:15,17	<b>couple</b> 79:10	<b>deemed</b> 52:1	<b>discuss</b> 19:24 24:3	<b>Dr</b> 3:3,4 7:9,10
40:20 67:2	<b>course</b> 15:21 61:22	<b>degree</b> 10:21,24	25:24 30:18 41:7	17:16 18:15 26:22
<b>contracts</b> 40:21	84:13 85:7 100:3	<b>delegates</b> 34:24	64:5 71:6	31:3 35:9,23
<b>contrary</b> 25:21	<b>court</b> 1:21 7:23	<b>deliberations</b> 24:22	<b>discussed</b> 35:3	36:23 37:1 41:14
52:2 58:5 59:12	8:16 92:6 101:4	<b>delisted</b> 65:22	<b>discussing</b> 20:22	41:18,23 42:1
<b>contribution</b> 52:17	<b>courtroom</b> 8:4	<b>department</b> 4:6	64:23 65:6 66:16	43:1,1 44:1,5,24
<b>contributions</b> 54:2	<b>create</b> 72:5,7	77:25 78:1	89:15 99:1	45:3 46:19,22
54:12	<b>created</b> 22:9,12,17	<b>deposition</b> 1:15	<b>discussion</b> 17:12	53:7,9 60:19,21
<b>converting</b> 35:15	22:21 23:1 50:25	<b>depth</b> 19:24	97:21	62:1 63:10,21
83:23	51:1 72:6 73:2,17	<b>derived</b> 55:25	<b>dispute</b> 64:22	68:5,7 71:10,12
<b>cooperate</b> 92:13,15	73:25 74:4 75:2,9	<b>describe</b> 13:8 14:13	<b>dissolution</b> 58:20	74:6 75:18 77:7
<b>coordinate</b> 35:17	90:3,8,16,20	14:14 21:5,6 22:7	59:3,18 64:9,13	84:25 87:13 88:6
<b>copies</b> 82:2	<b>current</b> 4:14 16:24	26:18 27:1 28:2	64:14 73:18 82:21	88:13 92:2,5 98:3
<b>copy</b> 4:7 63:16,19	43:2 67:15,16	29:6,7 32:3 49:1	<b>dissolve</b> 57:17,22	<b>Drive</b> 1:18 2:3
63:23 64:2 66:25	87:14	57:24,25 64:20,24	57:23 58:13 59:10	<b>due</b> 16:23 57:18,25
81:5 87:22 89:18	<b>currently</b> 11:18,25	69:12 72:1	59:11,11,14 87:1	58:1 60:12
93:22,23	20:5	<b>described</b> 28:2	<b>dissolved</b> 5:13 52:6	<b>dues</b> 19:10 51:15
<b>core</b> 65:24	<b>C.C.R</b> 101:23	<b>designate</b> 50:10	57:6 58:9,10	51:15,18,19,20
<b>corporate</b> 10:1	<b>C.H</b> 80:14	<b>designated</b> 88:21	73:16,20,23 74:1	<b>duly</b> 7:4 101:8
46:11 63:12		<b>Desmond</b> 34:17	92:12,14,21,24	<b>D-e-s-m-o-n-d</b> 84:8
<b>Corporatio</b> 1:10		84:7	93:19	
<b>corporation</b> 32:5,7	<b>D</b>	<b>detail</b> 24:4 57:3	<b>Division</b> 4:8	<b>E</b>
32:12 35:15 51:10	<b>D</b> 3:1	<b>details</b> 52:22 53:1	<b>Doctor</b> 24:2 34:15	<b>E</b> 2:1,1 3:1,1 4:1
54:24	<b>dance</b> 73:5	<b>determine</b> 95:8	36:2 41:12 45:11	5:1 6:1,1 101:1,1
<b>correct</b> 11:11 17:18	<b>date</b> 43:8 49:25	<b>determined</b> 91:13	75:21 77:9 79:8	<b>earlier</b> 31:12 54:5
17:19,25 18:17	50:8 86:10,13	<b>develop</b> 55:23	80:8	<b>eastern</b> 47:12
32:17 36:11 42:25	96:1,4 97:13	<b>developed</b> 55:19	<b>document</b> 5:4,6,7	<b>Ebere</b> 44:25 85:24
56:7 59:6 66:2,3	101:14	<b>Development</b> 14:12	31:7,9,17,20,23	88:7
69:4 80:23 83:18	<b>dated</b> 37:6 38:4	<b>Development</b> 14:12	32:2,4 36:4,9,15	<b>ECDU</b> 14:10 15:3
83:19 85:12 86:7	40:10 42:23 44:13	<b>die</b> 96:14	37:3,5 38:1 41:24	<b>Edison</b> 11:20
87:24 89:9,15,16	53:18 88:5 93:15	<b>died</b> 95:4	42:2,4,10 44:6,9	<b>educational</b> 10:12
90:22,23 91:3,6	<b>dates</b> 96:10	<b>difference</b> 71:2	44:11 45:8 46:14	<b>effect</b> 8:3 74:2
91:16,17 93:6,7	<b>days</b> 12:9	73:23 74:5	46:23,25 53:13,25	<b>effectively</b> 82:11
93:11 94:14,15	<b>day-to-day</b> 23:11	<b>different</b> 13:8 18:3	54:8 60:22,25	96:16
95:15,18 96:6,25	<b>December</b> 1:13	21:24 22:6 29:15	61:7,14 62:21	<b>elected</b> 24:14,15
97:1 98:7	22:23,25 43:5	42:10 43:10 100:1	63:5 68:11,14,18	26:23 28:25 32:9
<b>correctly</b> 75:14	73:20 92:20	<b>direct</b> 30:6 40:23	69:21 71:13,14,18	<b>election</b> 96:13
<b>cost</b> 40:19	<b>decide</b> 57:9,12	85:14	72:1 77:10,13	<b>employee</b> 101:16
<b>costs</b> 40:18	<b>decided</b> 81:12	<b>directed</b> 35:10	79:25 80:9 81:5	101:19
<b>Council</b> 24:21 25:2	<b>deciding</b> 57:22	<b>directive</b> 83:21	100:5	<b>empowered</b> 19:14
25:2 26:10,11,19	<b>decision</b> 33:3,17	95:13	<b>documents</b> 30:21	19:17 20:25
26:20	57:23 58:11,11	<b>directives</b> 83:11	35:21 45:13 63:24	<b>Emu</b> 47:8,10
<b>counsel</b> 2:6,11	91:25	<b>directly</b> 73:13,14	64:4 69:1 73:2	<b>enforcement</b> 93:5
88:22 94:9 95:12	<b>decisions</b> 24:23	87:11	79:3 98:15	<b>entered</b> 18:7
	25:11 35:4,6	<b>director</b> 13:4		

<p><b>entire</b> 93:6</p> <p><b>entities</b> 22:7 56:5 56:12</p> <p><b>entitled</b> 62:15 73:1 77:11</p> <p><b>entity</b> 12:13,24 13:2,5 18:23,25 20:23 21:1,24 27:11 30:19 32:22 54:22 56:18,21,25 60:3,8 78:8,10 98:5,22 99:2</p> <p><b>Enugu</b> 13:10 14:9 14:19,23</p> <p><b>Esquire</b> 2:3,8 37:7</p> <p><b>establish</b> 35:8,13 49:8,17,23,25 83:13,15</p> <p><b>established</b> 51:6 96:7,11</p> <p><b>et</b> 73:2,2</p> <p><b>Europe</b> 64:18</p> <p><b>events</b> 14:18</p> <p><b>everybody</b> 28:19 30:15</p> <p><b>evidence</b> 48:15 82:6 89:22 100:2</p> <p><b>exact</b> 43:7</p> <p><b>Exactly</b> 36:18</p> <p><b>examination</b> 3:3,4 7:9 79:7 98:2 101:6</p> <p><b>examined</b> 7:4</p> <p><b>example</b> 24:10 29:2 49:6</p> <p><b>exclusive</b> 70:14</p> <p><b>excommunication</b> 82:21</p> <p><b>excuse</b> 96:2,3</p> <p><b>excused</b> 100:16</p> <p><b>executive</b> 22:14 23:5,7,13 24:6,11 24:21,23 25:3 26:6,21 28:21 29:16,19 33:4 49:21 50:6,11</p>	<p>52:2,23 57:9 58:9 82:10,12,15 83:3 83:7,11 84:1 91:11,11,12 92:13 92:16,23 96:17,24 96:25</p> <p><b>executives</b> 87:2</p> <p><b>exhibit</b> 4:4,5,6,8,10 4:11,12,14,16,18 4:19,21,22,23 5:4 5:6,7,9,10,11 36:3 69:1 79:23,25 85:15 88:3,22,24 89:6 93:13,14 97:7</p> <p><b>exhibits</b> 4:3 5:3 81:20 100:1</p> <p><b>exist</b> 86:24</p> <p><b>existed</b> 90:12</p> <p><b>existence</b> 90:12</p> <p><b>exists</b> 81:2</p> <p><b>expand</b> 81:12</p> <p><b>expanding</b> 35:5</p> <p><b>expansion</b> 35:6</p> <p><b>expect</b> 9:12</p> <p><b>expel</b> 91:25</p> <p><b>expelled</b> 43:17,20 46:2,10 74:18 91:20,22 95:20,22</p> <p><b>explain</b> 18:18 22:5 24:10 57:5</p> <p><b>explained</b> 41:8 57:2</p> <p><b>explored</b> 66:18</p> <p><b>Ext</b> 2:10</p> <p><b>E-b-e-r-e</b> 85:24 88:7</p> <p><b>E-C-D-U</b> 14:10</p> <p><b>E-n-u-g-w-u</b> 14:11 14:23</p> <hr/> <p style="text-align: center;"><b>F</b></p> <hr/> <p><b>F</b> 101:1</p> <p><b>Fabian</b> 34:11 84:6 84:6</p> <p><b>fact</b> 52:6 92:1</p> <p><b>fair</b> 64:7 90:11</p>	<p>95:11</p> <p><b>familiar</b> 31:6,20 36:4 37:3 42:4 44:8 45:11 46:25 47:3,17 53:12 60:25 62:6,18 68:10 71:13 74:6 77:2</p> <p><b>Fantastic</b> 30:24</p> <p><b>February</b> 93:16</p> <p><b>federal</b> 10:2 12:22 54:21</p> <p><b>Fidelis</b> 34:20,20 84:8</p> <p><b>file</b> 32:16 34:7 39:3 39:3 67:19 68:16 94:12,17</p> <p><b>filed</b> 67:15 68:18 70:23 71:21 73:19 92:6 95:2</p> <p><b>filing</b> 4:7 31:14 77:24</p> <p><b>financially</b> 101:20</p> <p><b>find</b> 67:15</p> <p><b>fine</b> 72:22 78:20</p> <p><b>finished</b> 100:14</p> <p><b>firm</b> 38:10 39:23 40:7,12 41:1,4 94:10,12</p> <p><b>first</b> 20:1 21:7,11 21:13 31:22 41:3 46:4 61:18 65:12 67:24 69:3 73:15 79:13 80:17,21 83:2 90:25 91:4 96:1 99:7,12</p> <p><b>five</b> 29:4,6,8</p> <p><b>flip</b> 62:2,8</p> <p><b>floating</b> 63:24</p> <p><b>Floor</b> 1:18 2:4</p> <p><b>follow</b> 57:18</p> <p><b>following</b> 4:3 5:3 95:7,12</p> <p><b>follows</b> 7:5</p> <p><b>follow-up</b> 97:25</p> <p><b>foregoing</b> 101:11</p>	<p><b>forever</b> 52:7</p> <p><b>forgive</b> 53:20 95:19</p> <p><b>form</b> 34:1 49:4 52:18 54:3</p> <p><b>formal</b> 57:15</p> <p><b>formally</b> 98:23</p> <p><b>formation</b> 49:24 57:4</p> <p><b>formed</b> 54:9 91:14 96:15 98:5</p> <p><b>forming</b> 49:2</p> <p><b>forth</b> 101:14</p> <p><b>forward</b> 16:23</p> <p><b>found</b> 67:11 82:24</p> <p><b>foundation</b> 47:24 48:12,17 53:22 61:23 76:7 90:4</p> <p><b>founded</b> 75:11 79:17 96:8</p> <p><b>four</b> 38:23,24 49:10</p> <p><b>four-page</b> 79:24</p> <p><b>front</b> 79:23 80:3 85:16</p> <p><b>fulfilling</b> 22:16</p> <p><b>full</b> 14:2 88:13</p> <p><b>function</b> 23:11 30:7 30:8 58:17</p> <p><b>functions</b> 24:17 30:13</p> <p><b>funneled</b> 19:11</p> <p><b>further</b> 97:23 100:12 101:10,15</p> <p><b>F-a-b-i-a-n</b> 34:11</p> <p><b>F-a-b-i-n</b> 84:6</p> <p><b>F-i-d-e-l-i-s</b> 34:21</p> <hr/> <p style="text-align: center;"><b>G</b></p> <hr/> <p><b>general</b> 7:15 19:13 25:8 57:20 58:8 74:1 80:25 88:7 92:20,24</p> <p><b>generally</b> 8:13 83:25 86:15</p> <p><b>gentleman</b> 84:20</p> <p><b>gestures</b> 8:18</p> <p><b>getting</b> 78:17</p>	<p><b>gingerly</b> 73:6</p> <p><b>give</b> 9:7 10:12 14:1 52:21,25 59:25 81:1 83:12</p> <p><b>given</b> 22:13 32:15 32:21,23 35:9,12 50:15,16 52:4,21 59:20 73:4</p> <p><b>giving</b> 33:23</p> <p><b>go</b> 8:14 17:9,13 20:9,11,14,16 30:17 31:2 39:10 39:19,22 41:6 45:5 46:11 49:24 51:25 53:9,21 56:16 60:5,21 67:10 68:7 72:14 77:9 79:4 97:19</p> <p><b>goes</b> 25:21 49:18</p> <p><b>going</b> 8:14,14,20,24 9:12,13 17:13 18:3,24 19:23,23 44:1 45:2 46:18 49:5 53:6 64:16 67:4,10 68:3 71:5 71:6,9 72:16 76:8</p> <p><b>good</b> 7:10,21 38:21</p> <p><b>Gordian</b> 2:14 18:6</p> <p><b>government</b> 17:7</p> <p><b>granted</b> 86:22 88:13</p> <p><b>great</b> 10:6</p> <p><b>greater</b> 19:24 24:4</p> <p><b>greatly</b> 73:6</p> <p><b>grounds</b> 48:11 53:22 76:7</p> <p><b>group</b> 25:9 27:7 65:24</p> <p><b>groups</b> 26:16</p> <p><b>guess</b> 8:25 81:1</p> <p><b>guys</b> 72:25</p> <hr/> <p style="text-align: center;"><b>H</b></p> <hr/> <p><b>H</b> 2:3,8 4:1 5:1</p> <p><b>halfway</b> 70:8</p> <p><b>hand</b> 44:1 45:3</p>
--	--	---	--	---

46:17,18 50:20  
53:7 71:9  
**handed** 31:4,17  
42:1 44:5 45:6,14  
46:22 53:10 60:22  
75:21 77:10  
**handing** 36:2 37:1  
41:23  
**handle** 41:4  
**happen** 8:25 38:25  
**happened** 40:24  
67:17 94:23 95:16  
**Happenings** 4:15  
**head** 8:18  
**headquarters**  
22:10 26:9,17  
**health** 20:10,12  
**hear** 7:18,19 67:6  
**heard** 85:4 95:5  
**hearsay** 76:8  
**Heather** 1:20 101:3  
101:23  
**held** 1:16 16:12  
91:14 98:25 99:2  
99:2  
**help** 8:19 37:12,14  
37:16  
**helping** 79:20  
**hereinbefore**  
101:14  
**high** 33:21  
**hire** 67:23  
**hired** 19:19 37:11  
67:21,24,25  
**hold** 13:20,20 15:2  
96:16  
**holding** 98:5  
**home** 14:20  
**hometown** 14:22  
20:4  
**Honorable** 44:24  
85:24 88:7  
**Houston** 21:18,19  
33:5,9,9,10,12,15  
33:15,22 35:1  
80:18,21 83:8

85:12 86:6 91:2,7  
91:10 96:5

---

**I**

---

**Ibadan** 10:16,17,19  
10:22  
**Ibezim** 37:7,8,15  
38:22 39:1,20  
40:9,21 66:19  
**Ibezim's** 39:7 41:4  
**ID** 12:22  
**idea** 43:9  
**identical** 45:22  
**identified** 25:16  
43:15 44:6 46:23  
69:20,22,23,24  
**identify** 34:6 44:19  
85:18  
**ill** 84:25  
**Ilonze** 24:2 25:17  
26:22 34:15 41:12  
41:14,19 43:1  
44:21,24 63:21  
84:9 85:23 86:5  
86:12 88:6  
**imposter** 46:14  
**imposters** 46:10  
**impression** 67:4  
95:1  
**improper** 93:10  
**inactive** 39:3,4  
51:22,22  
**inaugural** 75:8  
**inaugurate** 52:24  
75:14  
**inaugurated** 21:8,8  
21:19 22:15 49:25  
50:13 75:5  
**inauguration** 34:25  
50:14 80:17  
**included** 65:18,21  
**includes** 65:15,17  
**including** 28:20  
50:11  
**incorporate** 37:12  
76:25

**incorporated** 12:17  
12:18 20:23 54:19  
55:1,3,7,8,10 98:4  
98:17  
**incorporating** 19:4  
19:7  
**incorporation** 4:9  
32:1 54:18,20  
76:16,17,19  
**indicates** 43:10  
**indigents** 14:19  
79:20  
**individual** 28:5,22  
29:17 55:2,5 56:6  
59:4 100:5  
**individually** 54:19  
55:7,9 56:17  
**individuals** 34:6  
42:11 45:22,25  
47:18  
**induct** 28:15,15  
**inducted** 28:7,7,12  
28:12 49:11,11  
50:19 51:19  
**induction** 34:25  
**informal** 8:1  
**information** 17:7  
39:6 40:22 59:25  
68:15 69:15 70:12  
70:20,21 71:17  
76:22 86:1  
**infringement** 88:14  
**infringers** 19:18  
**initial** 52:17 66:17  
**initially** 92:13  
**Innocent** 34:14,14  
84:11  
**inquired** 67:8 95:6  
**insert** 47:23 61:21  
**instructed** 9:14  
**instruction** 10:7  
32:16,21,23 33:2  
33:23 34:7 35:19  
**instructions** 7:16  
36:16  
**intellectual** 96:16

98:6,11,16,20,25  
**interest** 12:24 58:6  
**interested** 101:20  
**interests** 14:16 52:3  
**interject** 53:20  
**internal** 24:20  
25:14  
**internally** 58:12  
**international** 1:5  
1:10 4:14,16 5:12  
16:3,8 19:1 21:15  
21:16 22:1 32:25  
41:16 43:19 44:13  
52:4 69:8 76:3  
80:16 82:17 87:6  
87:8,17 93:19  
99:18  
**internationally**  
24:25 55:21,22  
**internet** 74:3  
**involved** 18:16  
**involvement** 66:14  
68:13  
**involves** 72:23  
**issue** 64:22 65:2  
**issued** 74:2 80:16  
93:9  
**issues** 35:4 72:24  
72:25  
**itemized** 40:17,18  
**items** 94:4  
**Iw** 43:11  
**Iwuchukwu** 34:19  
42:15,21 43:12,16  
84:10,11  
**I-b-a-d-a-n** 10:17  
**I-b-e-z-i-m** 37:7  
**I-l-o-n-z-e** 24:2  
41:12 44:21 84:10  
**I-w-u-c-k-w-u**  
84:11  
**I-w-u-k-w-u[ver...**  
34:19

---

**J**

---

**Jackson** 37:20,23

38:11,16 39:13,24  
40:7,11 41:1  
66:21,22 67:2,12  
94:11  
**January** 51:16 74:3  
**Jersey** 1:10,19,22  
4:6 11:17,20 12:3  
12:14 13:23,25  
14:10,10,12 16:22  
19:2 30:20 33:9  
34:8 51:9 77:18  
78:1,10 87:5,8,14  
98:4,12,12,17,25  
99:4 101:5  
**Jersey[verbatim]**  
33:5  
**Joseph** 24:2 34:15  
41:12,18 84:9  
**judge** 8:5  
**July** 42:24 44:13  
88:5  
**Junction** 1:6 17:24  
18:10 56:18 65:18  
69:23 70:24 74:22  
74:24 77:19  
**juncture** 92:22  
**June** 10:25  
**J.I** 44:21,24

---

**K**

---

**keeps** 51:19  
**kind** 8:18 11:1  
16:25 39:25  
**kindly** 88:4  
**kinds** 63:24  
**kingdom** 23:3  
69:17 86:20  
**Klauber** 37:20,23  
38:10,16 39:12,23  
40:7,11 41:1  
66:20,22 67:2,11  
94:10  
**know** 9:1,4 29:11  
39:16,23 47:19  
48:1,16 54:11,13  
54:23 61:20 62:24

62:25,25 63:7  
66:10 67:9 72:10  
72:21,23 73:1,1  
74:9,25 75:4,12  
78:21 79:2,4,8  
80:2 81:15,16  
82:20 83:24 85:15  
88:11,18 89:14  
90:3 94:19,22  
95:7 96:13 100:12  
**knowledge** 39:12  
54:16 55:15 56:13  
56:15 63:13 64:9  
70:15 74:22 77:23  
78:13 87:23 94:16  
98:10

**known** 32:22

**k-l-a-u-b-e-r** 37:23

## L

**L** 1:20 101:3,23  
**labeled** 42:2 60:23  
62:9  
**laid** 48:17  
**law** 1:16 38:10  
39:23 40:7 41:1  
92:6,7 94:10,12  
**Lawrenceville** 1:18  
2:4 49:5,7,15 50:9  
50:24 60:11,13  
**laws** 60:10  
**lawsuit** 92:7,11  
**lawyer** 35:11 37:9  
37:10,11 39:22  
67:14,15,16,23,24  
**lead** 35:11  
**leader** 30:2,10  
**leaders** 23:15 27:7  
50:11  
**leadership** 22:14  
23:5,13 24:6,11  
27:4 28:22 29:16  
29:18,20 33:4,18  
33:22 57:12 65:24  
**left** 10:8 18:8 40:22  
44:16 74:7

**left-hand** 42:9  
**legal** 1:23 39:13  
40:12,14 50:20  
60:8  
**legitimate** 70:25  
**Lenox** 1:17 2:3  
**letter** 4:10,11,18,21  
4:22,23 5:9,10  
37:5 38:2 41:2  
42:5,17,20,23  
43:9,10 44:16,23  
48:4,5,6,14 53:16  
53:18 74:2 75:24  
75:25 77:3 80:13  
80:16 85:22 86:10  
86:16 87:19,22  
88:5,16 89:18  
93:15

**letterhead** 37:6

44:12 45:12,15,21  
45:23,24,25 46:7  
69:2 70:22,25  
72:3,4,4 73:15,25  
97:5,10,11,13

**Letterheads** 4:13

**letters** 93:9

**let's** 30:17 70:1  
72:22

**level** 54:21

**license** 22:14 50:15  
50:16 51:11 52:4

**LINE** 6:2

**listed** 42:13 44:20  
46:6,8

**listing** 42:10 44:16  
73:21

**little** 18:24 19:25  
20:21 25:25 41:8  
82:9

**live** 28:10

**lived** 11:14,16

**living** 81:17

**LLC** 37:24

**local** 28:9 51:8

**locate** 37:16

**located** 13:22,23

26:8 27:10,12,15  
27:22 28:15 47:5

**locating** 37:13

**logo** 64:21 89:24  
90:8,16,20 91:1,4  
91:13

**long** 11:4,5,21  
20:17 43:3 51:12

**longer** 58:22,23  
59:16,23 65:19  
70:24 74:19 92:25  
93:2

**look** 13:21 14:16  
37:2 53:25 62:4,6  
62:18 67:23 70:22  
71:12 81:19 89:6

**looked** 38:20,22  
67:14

**looking** 23:1 69:3

**looks** 36:9 65:3

**Loss** 62:15

**lot** 79:8 89:24

## M

**MAGNA** 1:23

**main** 90:22,24,24

**manage** 25:5

**Management** 33:19

**manages** 23:9

**Maple** 2:9

**March** 72:12

**mark** 66:15 70:14

**marked** 31:18  
35:23 36:3,21  
37:2 41:22 44:2  
45:2 46:17 53:4  
53:10 60:18 68:8  
71:9 75:17,22  
77:6 79:23 80:1  
81:20 100:2

**matron** 74:17

**Matt** 30:22 35:22

36:20 41:21 45:1

46:16 53:3 60:17

68:2 71:8 75:16

78:18,24

**matter** 1:2 7:14,14  
48:15 68:9

**Matthew** 2:3,8 7:11

**matured** 89:11

**mean** 29:11 51:13  
57:25 58:13,20  
59:14,17 77:1  
78:20 90:5 98:18  
99:8 100:6

**meaning** 21:25  
66:15

**means** 7:25 22:8  
28:15 49:12 58:1  
59:20

**medical** 10:21,24

**medicine** 11:1 12:1

**meet** 25:4,10 26:12

26:14,16 28:10  
51:11,12,23 52:1  
52:8,19 58:6

**meeting** 25:8 33:20

34:9,16,18,22  
35:2,3 57:20,20  
58:8,10 67:7,8  
74:1 83:12 84:2  
84:15,23 85:12  
86:6 91:9,10  
92:20

**meetings** 13:20

14:17 51:21 58:24

**meets** 26:7

**member** 13:9,10  
14:6 15:6,7,13,21  
15:24 16:6,9,13  
16:15 24:20 25:1  
25:8,9 28:4,4,5,8  
28:18,24 29:3,23  
30:7 43:18,18  
49:9,12 50:23  
51:13,14,16,19,24  
59:17 74:16,19,21  
74:23

**members** 13:21

14:16 25:10 27:17  
27:19,22,25 28:21  
28:23 30:5,6 35:1

42:7 46:1,8,9,13  
46:13 50:4,5,17  
50:18,18,19 51:14  
62:16 84:1

**membership** 28:11  
49:14 50:2 62:15

**memory** 54:1

**men** 85:5

**mentioned** 17:1  
18:2,15 20:2 26:3  
35:20 43:1

**met** 27:2 47:20,21  
48:1 50:1,7 83:7

**Mgbako** 1:16 3:3,4

7:3,9,10 17:16

18:15 31:3 35:23

36:24 37:1 41:23

42:1 44:1,5 45:3

45:11 46:19,22

53:7,9 60:19,21

62:1 63:10 68:5,7

71:10,12 74:6

75:18 77:7 79:7

87:13 88:13 98:2

98:3 101:7

**Miami** 1:7 56:21

65:17 69:22 70:24

**mind** 79:12

**minutes** 7:23

**mischaracterizing**  
66:5

**mishear** 29:10

**misheard** 29:13

**misspoke** 77:3

**mistaken** 88:23

**moment** 90:18  
97:20

**moments** 86:4

**monitor** 19:17 25:5

87:15

**Montclair** 12:3

**month** 33:6,6 72:11

**monthly** 25:4,6

**morning** 7:10

**move** 81:8 82:5

88:1 89:21 94:1

100:1  
**moved** 11:13,14  
 39:1  
**movement** 17:10  
**moving** 48:9  
**mswyers@thetra...**  
 2:11  
**mtaylor@stark-s...**  
 2:5  
**M.D** 1:16 7:3 12:11  
 101:7

---

**N**

---

**N** 2:1 3:1,1  
**name** 7:11 12:10  
 32:4,6 58:24 60:7  
 65:4 69:7 84:21  
 88:11 98:8 99:10  
 99:21  
**named** 44:20 45:22  
**names** 44:17 45:19  
 45:25 46:4,6,12  
 73:16 83:25  
**nation** 23:9  
**national** 16:7 23:7  
 23:8 25:3 26:10  
 26:19,20,22 28:8  
 28:13 50:8,12  
 51:18 63:21 80:14  
 82:17 85:25 88:6  
**nationally** 24:25  
**Ndbubizu** 2:14  
**Ndubizu** 18:6 74:7  
 74:21 76:1,12,18  
 77:15,24 84:21  
 92:2,5  
**Ndubizu's** 78:14  
**nearly** 45:21  
**necessary** 19:19  
**need** 8:15 10:9 65:1  
 66:18 78:20 92:9  
 97:6  
**neither** 101:16,18  
**network** 14:17  
**networking** 13:19  
 79:18

**never** 47:20,21 48:1  
 48:5,6 52:14  
 53:14 54:10 61:6  
 67:5 75:25 77:14  
**new** 1:10,19,22 4:6  
 11:16,20 12:3,14  
 13:23,24 14:10,10  
 14:12 16:22 19:1  
 30:20 33:5,9 34:8  
 49:15 51:9 77:17  
 77:25 78:9 82:24  
 87:5,8,14 91:14  
 91:16 96:13 98:4  
 98:12,12,17,24  
 99:3 101:5  
**nice** 81:1  
**Nigeria** 1:5,9 4:14  
 4:16 5:4,12 10:16  
 10:18,19,19 14:20  
 14:22,24 15:18,22  
 16:2,7 19:12,13  
 19:16 20:4,5,13  
 20:15 21:3,8,14  
 21:21,25 22:9,10  
 22:15 23:3,14,16  
 23:18,24 24:18  
 25:5,6,18 26:8,9  
 26:13,14,16 27:12  
 27:17,22 28:17  
 29:18 30:15 32:25  
 34:24 35:9 39:2  
 41:8,10,16 43:17  
 43:19 44:12 46:11  
 47:6,7,10,11,12  
 47:12 48:24 49:7  
 49:17 52:3 54:15  
 54:17,20,24,25  
 55:1,2 62:22  
 63:12 64:15 69:7  
 69:16 76:3 79:9  
 79:14 80:15,19,22  
 81:2,12,18 86:3  
 86:19,20,23 87:6  
 87:7,7,9,10,12,17  
 90:21,22 91:2,8  
 92:7,7,23 93:18

99:15,17,18  
**Nigerians** 81:17  
**Nigeria's** 96:3  
**Nigeria/Internati...**  
 4:13  
**NJ** 2:4  
**nodding** 8:18  
**nonprofit** 4:9 32:12  
**non-member** 51:23  
**Notary** 1:21 101:3  
 101:24  
**notes** 90:19  
**Notice** 5:11 64:3  
 93:16  
**notification** 16:21  
**notifications** 16:25  
 17:1  
**November** 73:19  
**number** 12:22 38:4  
 46:5 80:2 88:17  
 89:2,5,7 90:1 97:7  
 97:7  
**N-d-u-b-u-i-z-u[v...**  
 92:6

---

**O**

---

**O** 1:16 7:3 101:7  
**oath** 7:24 50:21  
 59:22  
**Obinwa** 42:22  
**Obioha** 80:14  
**object** 53:21 76:6  
**objection** 9:9 18:13  
 34:1 47:23 48:11  
 61:21 62:11 63:3  
 66:4 72:17 100:7  
**objections** 100:3,8  
**obligation** 8:8  
**obtain** 10:21 63:19  
 87:15  
**obviously** 72:25  
**occurred** 95:9  
**October** 66:25,25  
 67:1 86:11  
**offending** 87:1  
**office** 1:1 4:5 7:12

8:2 9:23 12:2,5,7  
 12:7 27:4,8 29:2  
 39:1,7 66:1 68:19  
 71:22 73:3 95:3  
 95:16 97:4,14  
**officer** 13:1 50:20  
**officers** 23:6 24:15  
 26:23  
**offices** 1:17  
**official** 15:2  
**officials** 33:21  
**Off-the-record**  
 17:12 97:21  
**Ogugua** 34:17,18  
 84:7,8  
**Oh** 40:1 80:6  
**Ojukwuike** 34:12  
 34:12 84:12  
**okay** 7:10,18,21,21  
 8:13,23 9:4,5,11  
 9:17,22 10:6,6,14  
 10:18,20,23 11:1  
 11:4,8,12,18,24  
 11:24,25 12:4,10  
 12:12,18,21,23  
 13:7,14,17,24  
 14:5,8,13,21 15:2  
 15:5,7,17,20,23  
 16:4,15,19,25  
 17:20 18:1,2,15  
 19:6,23 20:14,19  
 20:20 21:5,10,17  
 21:20 22:4,9,12  
 23:12 24:1,3,5,9  
 25:11,19,24 26:5  
 26:10,15,23,25  
 27:9 28:18 29:5  
 29:12 30:3,17  
 31:3,9,12,16,16  
 32:2,10,14 33:1  
 33:14,16 34:4,5  
 35:9,12,20,25  
 36:6,19,19 37:5  
 37:15,19,21 38:13  
 38:16 39:8,18  
 40:16,25 41:6,13

41:20,21,23 42:1  
 42:6,9,16,23 43:9  
 43:21,23,24 44:15  
 44:22 45:1,20  
 46:15,22 47:13  
 48:4,7,8,20 49:1  
 49:13 51:11 52:11  
 52:16 53:2,18,25  
 54:14 55:4,10,15  
 56:9 57:15 58:19  
 59:24 60:16,21  
 61:6,12,19 62:1,8  
 62:23 63:10,25  
 64:20 65:5 66:8  
 66:12 67:18 68:13  
 68:17 69:10 71:3  
 71:5,12,24 72:10  
 73:15 74:6,9,13  
 74:20 75:6,10,15  
 75:21 76:1,5,24  
 77:4,5,15,21,21  
 77:23 79:17,21  
 80:11,13,25 81:4  
 81:7,19 82:1,4,23  
 83:1,6,10,17,24  
 84:14,19,25 85:4  
 85:14 86:4,9,15  
 87:21,21,25 88:9  
 88:16,20 89:7,9  
 89:17,20 90:11,15  
 90:18 91:18,24  
 93:3,8,12,21,25  
 94:21,24 95:7,25  
 96:20 97:2,18,24  
 98:9 99:14,22  
 100:10  
**Okekearu** 34:20  
 84:9  
**once** 48:10 51:1  
 95:22  
**Onisha** 52:23 57:9  
 57:12  
**Onwuachu** 34:10  
 34:10,11,11 84:6  
 84:7  
**opened** 52:12,14,15

**operate** 48:24  
 50:16,17 51:8,11  
 52:10 56:6,10  
 58:14,25 59:6  
 60:10 86:25  
**operated** 22:1  
**operates** 22:12,19  
 55:13 87:8  
**operating** 24:5  
 48:22 55:6 57:8  
 57:10 58:17 59:2  
 59:15 60:1  
**operations** 21:3,22  
 30:9 41:7 51:4,7  
 76:13  
**opportunity** 9:9,11  
 9:16  
**opposing** 88:22  
 94:9 97:2  
**Oral** 1:15  
**order** 54:3 57:16  
**ordered** 96:17,24  
**Orders** 4:20 61:4  
 61:17  
**organization** 13:11  
 13:15 14:4,15  
 19:3,5,12 24:25  
 75:7 79:15 82:11  
 90:24 93:6  
**organizational** 41:9  
**organized** 13:17  
 32:6 86:21  
**Orlu** 4:15 47:2,4,5  
**outside** 81:18,18  
**owned** 90:21  
**ownership** 12:23  
**O-b-i-n-w-a** 42:22  
**O-g-u-g-u-a** 34:18  
 84:8  
**O-j-u-k-w-u-i-k-e**  
 34:13 84:13  
**O-k-e-k-e-a-r-u**  
 34:21 84:9  
**O-n-w-u-a-c-h-u**  
 34:12 84:7

---

**P**


---

**P** 2:1,1  
**packet** 62:3  
**page** 3:5 6:2 31:22  
 42:17 46:4 62:2,9  
 62:9 69:3,11 70:3  
 70:7 71:25 72:2  
**pages** 3:3 45:9,14  
 68:25  
**paid** 19:10 40:6  
 51:15 94:20,22  
**paper** 81:24,25  
**paragraph** 88:10  
 88:12  
**part** 12:15 27:6  
 40:5 47:12 52:17  
 54:22 82:20 92:25  
 93:2  
**participates** 24:22  
**particular** 60:3  
**parties** 13:20  
 101:17  
**patent** 1:1 66:1  
 68:19 71:21  
**patron** 26:25 27:2,6  
 27:6 28:3 74:17  
 87:13  
**patrons** 16:7 25:4  
 26:24 28:20 33:19  
 50:11 83:5 84:17  
**pause** 48:10  
**pay** 40:3 51:18,20  
 60:12  
**pays** 51:14  
**PC** 15:17 20:21  
 23:16  
**PCINI** 96:2  
**PCINI's** 96:2  
**PCNI** 1:5,6,6 4:14  
 7:14 10:3 16:4,12  
 17:17,23,24 18:16  
 18:19,22,23,25  
 20:23 21:25 22:6  
 22:8,9 23:14,23  
 24:9,12 27:11,15

27:17,21,22 29:18  
 30:18 31:11 32:17  
 32:22,22 33:22,24  
 38:17 41:7,9,11  
 41:15 42:7,7 43:2  
 47:3,4 48:20,24  
 49:2 52:12 54:3  
 55:17,21,23 56:4  
 56:11,17,21,24  
 57:4,7,17 59:5  
 61:9 63:11 64:11  
 64:21 65:7 67:18  
 70:13 74:22 75:7  
 76:13,16,19,25  
 77:16 78:9,14  
 86:13,22 87:14  
 92:23,25 93:2  
 94:13 95:14,23  
 98:4,6,12,12,16  
 98:24 99:3  
**pending** 7:13  
**people** 34:9,16,23  
 46:8 49:10 84:16  
**Peoples** 1:4,9 4:12  
 4:14,16 5:4 15:17  
 15:21 16:2,7  
 19:15 21:2,7,14  
 21:21,25 22:15  
 24:18 25:6,10,18  
 28:17 30:14 32:24  
 41:16 43:17,18  
 44:12 46:1,9,13  
 49:6 52:3 54:24  
 59:17 61:3,16  
 62:21 64:15 69:7  
 74:16,18 76:3  
 79:9,13 80:15,18  
 80:22 81:2,12  
 86:3 87:5,7,9,11  
 87:16 90:21 93:18  
 96:3 99:18  
**People's** 4:19 5:12  
**perfectly** 7:20  
**perform** 40:12,14  
**performed** 39:24  
**period** 49:13

**permanent** 76:2  
**permission** 91:1,8  
**personal** 9:25  
**personally** 52:11,14  
**Petition** 7:13 66:16  
**petitioner** 31:19  
 56:16 65:15 69:20  
 75:23 91:20  
**petitioners** 1:7 2:6  
 7:13 9:24 31:5,5  
 42:3 44:7 45:9  
 46:5,24 53:11  
 60:24 62:10 77:12  
 95:21  
**petitioner's** 90:13  
**phases** 40:19  
**photocopy** 38:3  
**physician** 10:13  
**physicians** 12:5  
**piece** 59:19  
**pieces** 97:5  
**place** 33:21 57:16  
 101:13  
**placed** 79:23  
**Plaintiff's** 36:3  
**please** 47:24 72:15  
 73:5 80:12 81:22  
 84:5 85:15,19  
 93:13  
**pledge** 28:16  
**Plus** 4:4  
**point** 74:21 76:11  
**position** 15:3  
**possession** 63:16  
**possibility** 94:24  
**possible** 94:6  
**practice** 11:2,3  
 12:1,12,14,15,20  
**practicing** 11:5,8  
**preparation** 68:14  
**present** 2:13 11:9  
 49:19,20 84:2  
**Presenting** 25:1,2  
 26:11  
**preserved** 100:9  
**president** 23:7,8,8

23:19,22,23 24:1  
 25:3,17 26:21  
 28:13,13 41:11,15  
 41:18,18 42:14  
 43:2,3,4,6,11,14  
 43:15,16 44:20  
 49:18,19 50:8  
 63:21 80:15 83:4  
 85:23 86:12 88:6  
**presidents** 26:14  
**pre-marked** 4:3 5:3  
**Princeton** 1:5 15:25  
 16:1,1,5,9,12,14  
 16:16 17:17,23,24  
 18:10 24:9,12  
 25:7,13,18 56:18  
 65:17 69:23 70:23  
 74:12,15,22,24  
 75:7 77:19  
**prior** 21:2,20 22:1  
 35:2 56:12,18,22  
 56:25 71:20 75:6  
 77:1 90:12 94:10  
 99:3 101:6  
**privilege** 72:20  
 73:8  
**probably** 20:11  
 72:12  
**problem** 60:6  
**procedure** 57:16  
**proceeding** 8:20  
**process** 25:25 49:2  
 52:18 57:3,19,25  
 58:1 59:4 64:10  
 64:13,14 66:13  
 83:23  
**Produce** 64:4  
**Professor** 34:13,14  
 84:11  
**proffers** 60:7  
**projection** 40:18  
**proper** 48:17  
**property** 96:17  
 98:6,11,16,19,20  
 98:25  
**proprietorship**

12:20  
**prosecute** 87:16  
 88:14  
**protect** 99:21  
**protected** 73:5  
**provide** 39:13  
**provided** 68:15  
 70:12 97:14  
**providing** 71:17  
 79:19  
**psychiatrist** 11:6,9  
 12:8  
**psychiatrists** 12:6  
**psychiatry** 11:3  
 12:12  
**Public** 1:21 5:11  
 93:16 101:4,24  
**pulling** 30:22  
**purpose** 13:18 32:5  
 38:9 63:2,3 98:5  
**purposes** 82:10  
**pursue** 67:2  
**put** 7:24  
**P-1** 4:4 68:2,8  
 88:22,23,25  
**P-10** 4:14 46:18,23  
 48:12  
**P-17** 4:16 35:23  
 36:3  
**P-18** 4:18 36:21  
 37:2 38:1  
**P-19** 4:19 60:18,23  
**P-2** 4:5 71:9 97:7  
**P-20** 4:21 75:17,22  
**P-21** 4:22 77:6,11  
**P-23** 4:23 53:4,10  
 53:21  
**P-3** 4:6 30:23 31:4  
**P-4** 4:8 30:23 31:18  
 32:3  
**P-5** 4:10 41:22 42:2  
**P-6** 4:11 44:2,6  
**P-7** 4:12 45:2,8  
**P.C** 1:17 2:2  
**p.m** 100:17

---

**Q**


---

**qualifications**  
 28:10 49:20  
**qualify** 50:17,18  
**quarter** 26:7  
**question** 8:15,23  
 9:3,7 18:20 27:18  
 29:14 38:21 63:5  
 64:12 95:20 97:25  
 98:9,13  
**questioned** 97:2  
**questions** 8:9 9:18  
 9:19 72:21 79:1  
 79:10 94:9 99:24  
 100:13  
**quick** 72:17 78:17  
 97:25

---

**R**


---

**R** 2:1 6:1 101:1  
**raise** 50:19  
**rapid** 35:6  
**put** 7:24  
**reactivate** 39:9  
**ready** 79:6  
**really** 8:19  
**reason** 39:3 60:13  
 61:13  
**reassert** 73:7  
**recall** 83:25 84:2  
**Receipt** 4:17  
**receive** 10:24 16:21  
 17:2 19:10 39:6  
**received** 36:13 48:5  
 48:23 54:10 95:3  
**recess** 78:23  
**recognize** 80:8  
**recognized** 30:1,1  
 30:10 49:10 58:23  
 96:21  
**recognizing** 27:4  
**record** 17:9,14 18:6  
 47:22 53:20 64:1  
 64:6 78:22 81:9  
 83:2 85:18 97:19  
 97:22 100:9,15

**Recording** 4:9  
**reference** 30:25  
 48:13,14 88:21  
 93:12 97:6  
**references** 88:17  
**Referencing** 88:3  
**referring** 30:19  
 46:4  
**refers** 88:18,19  
**reflect** 71:1  
**reflects** 73:21  
**refresh** 54:1  
**refuse** 59:11  
**regarding** 5:11  
 24:24 25:17 76:12  
 93:17 95:20  
**regardless** 86:24  
**register** 17:4 19:8  
 19:15,21 20:25  
 32:21,24 33:24  
 37:14,16 38:17  
 65:25  
**registered** 12:13,16  
 14:3 17:17 19:1  
 19:20 20:24 30:20  
 32:6 46:12 51:7  
 51:10 54:25 56:8  
 56:12,18,21,25  
 60:2,14 63:11,11  
 69:16,16,17,18  
 77:16 78:10 86:19  
 87:6,10 91:15  
 99:8,11,13,14,17  
 99:17,20  
**registering** 60:8  
 66:13 95:14  
**registrant** 1:11  
 2:11 10:3 70:13  
**registrants** 37:13  
**registration** 1:3  
 17:3,5 31:10 59:5  
 59:19 86:25 89:11  
 89:13 90:2  
**regular** 27:16  
**related** 35:4  
**relationship** 92:10

**relative** 101:16,18  
**relevant** 82:16  
**remain** 51:12  
**remember** 15:15  
 20:3 34:16 38:6  
 75:13 76:23 84:15  
 84:18,20  
**removed** 22:24  
 25:23  
**renew** 17:5  
**rent** 12:7  
**report** 23:6,15,17  
 23:18,21,22 87:11  
**reporter** 1:21 7:24  
 8:17 13:12 14:25  
 25:20 29:24 33:8  
 37:22 39:21 47:9  
 57:11 65:20 82:14  
 92:4,18 96:9  
 101:4  
**reports** 23:14  
**representative** 10:1  
 10:2 18:9  
**represents** 7:12  
 9:23  
**request** 63:20,22  
**requested** 64:3  
**requests** 39:5  
**required** 52:24  
 53:1 54:2 58:3,7  
**requirement** 54:7  
**requirements** 22:16  
 29:1,6,8 50:1,6  
 51:10,24 52:8  
**reside** 11:19  
**resident** 49:8  
**respond** 9:10 95:4  
**response** 4:5 8:15  
 9:1 39:4 67:9  
**responsibilities**  
 16:20 19:7 25:14  
 25:15  
**responsibility**  
 24:16,20 27:5  
 30:12  
**responsible** 31:13

33:23 71:17 77:24  
 78:4 82:13  
**restate** 48:11  
**result** 83:10,20  
**results** 40:8  
**retained** 94:12  
**return** 77:25 94:8  
**reverse** 60:5  
**review** 36:14 57:21  
 68:17 71:16  
**reviewed** 71:20  
**revised** 71:1 72:3,4  
**revisit** 10:10  
**revocation** 58:14  
 58:16 59:3 64:10  
**right** 9:6 15:9,15  
 18:12 27:21 36:22  
 38:2 41:6 43:7  
 46:16 60:17 68:1  
 75:15 78:16,22,24  
 85:9 86:9 87:1  
 92:22 96:23 97:6  
**rights** 32:7 91:13  
 93:5 98:16,19,20  
 99:3  
**rings** 5:6,7 65:4  
 69:6 81:24 90:9  
**Road** 12:2  
**role** 78:14  
**room** 8:3 12:8 18:7  
 84:22 85:8  
**Rule** 10:2  
**rules** 51:8 56:2  
**run** 30:12 82:8,11  
 82:17

---

**S**


---

**S** 2:1 3:1,1 4:1 5:1  
 6:1,1  
**Sam** 34:19 42:15,21  
 84:10,10  
**sanctioned** 25:22  
**Saturday** 80:19  
**saw** 42:5  
**saying** 86:16  
**says** 61:16 69:15

<b>searched</b> 40:1,5	75:17 77:7 98:15	<b>spell</b> 85:1	<b>stipulations</b> 52:19	73:12 75:19 76:6
<b>seated</b> 74:7	<b>showed</b> 70:22	<b>spelled</b> 10:17	52:21	78:7,19 79:5,7,22
<b>Sebastian</b> 37:7	77:10	<b>spelling</b> 20:3	<b>stop</b> 57:8,10 59:15	80:6,7 81:8,10
<b>second</b> 42:17 62:2	<b>showing</b> 35:22	<b>spells</b> 22:11	60:1	82:5,7 88:1,2 89:4
73:21,24 88:9,12	<b>side</b> 42:9 44:16	<b>spoken</b> 79:8 89:24	<b>Street</b> 11:20	89:21,23 94:1,7
97:8	<b>signatories</b> 19:9	91:9,19 96:18	<b>strike</b> 48:8 77:21	97:19,22 99:23
<b>secretary</b> 29:22,25	<b>signature</b> 31:23,24	<b>sponsor</b> 49:15	94:25 98:23	100:6,14
30:4,4,11 44:25	31:25 36:5,6 38:3	<b>stamp</b> 31:5 44:7	<b>structure</b> 24:11	<b>S-a-m</b> 34:19 84:10
47:15 85:25 88:8	<b>signatures</b> 47:14	45:9 46:24 75:22	26:19 41:9	
<b>section</b> 70:5	<b>signed</b> 36:10 39:15	77:12	<b>structured</b> 72:21	<b>T</b>
<b>sections</b> 62:14,17	39:16 40:20 42:19	<b>stamps</b> 42:2	<b>stuff</b> 8:19	<b>T</b> 3:1 4:1 5:1 6:1
<b>Security</b> 51:15	42:21 44:23 67:1	<b>stand</b> 26:2	<b>subject</b> 86:16 90:1	101:1,1
<b>see</b> 42:11 44:15	<b>signing</b> 38:7 40:21	<b>Standing</b> 4:20 61:4	90:2 100:2,8	<b>Table</b> 62:4
47:13 59:18 70:8	<b>similar</b> 53:15	61:17	<b>submitted</b> 97:9	<b>take</b> 8:17 19:18
77:21 86:9	<b>simple</b> 79:25	<b>stapled</b> 45:8 68:25	<b>subsidiary</b> 18:25	36:13 37:2 57:16
<b>seeing</b> 61:18	<b>Sir</b> 44:21,24	69:1 70:3 71:25	32:24 33:24 34:8	62:4 67:5 71:12
<b>seen</b> 48:6 53:14,15	<b>sit</b> 70:18 71:4	<b>Stark</b> 1:17,17 2:2,2	35:8,17 82:24	78:16 81:19
54:11 61:6,8,9,15	<b>sitting</b> 8:2 18:8	7:12,12	83:13 87:4,5	<b>taken</b> 59:24 101:12
61:17 75:24,25	79:3 89:14	<b>start</b> 7:15 9:19	91:14,16 96:15	<b>takes</b> 38:23
77:13,14	<b>sixth</b> 70:3	10:11	<b>Suite</b> 2:9 12:3	<b>talk</b> 20:20 27:24
<b>SEG</b> 67:7,8	<b>Smart</b> 44:25	<b>state</b> 1:22 4:6 12:14	<b>sum</b> 4:17 36:13	48:20
<b>selected</b> 65:24	<b>social</b> 13:7,9,16,19	14:24 16:22 17:4	<b>supervise</b> 25:5	<b>talking</b> 99:10,19
<b>send</b> 19:12 66:23	14:5,14,18 15:13	30:20 51:9 55:11	<b>supplied</b> 97:4	<b>tax</b> 76:21 77:25
76:15,18,21	18:4 30:7 51:15	59:6 60:3 101:5	<b>supposed</b> 39:19	<b>taxes</b> 60:12
<b>sends</b> 17:7	51:15 59:25 79:15	<b>statements</b> 87:18	40:14 41:4 52:25	<b>Taylor</b> 2:3 3:3 4:3
<b>senior</b> 96:24	79:16 86:18	<b>states</b> 1:1 11:15	54:12 58:16,17	6:2 7:9,11,17,21
<b>sent</b> 41:2 42:6	<b>sole</b> 12:19	13:10 17:4 21:3	92:2,14	7:22 13:13 15:1
66:23	<b>somebody</b> 27:2	21:12,22 22:2	<b>sure</b> 9:2,15 10:10	17:11,13,15,22
<b>separate</b> 17:23	37:13 46:7 67:7	23:4,21 24:6	17:11 26:1 47:11	18:5,11,14 30:22
21:24 56:5	<b>sorry</b> 15:12 29:12	27:10,16,20 35:14	50:4 60:9 61:24	31:1 33:11 34:3
<b>separately</b> 56:5	64:21 65:9 69:2	35:18 47:8,10	63:22 64:3 94:5	35:22,25 36:1,20
<b>September</b> 77:1	72:7 77:2,2 78:21	48:23 49:3 52:13	<b>Suspension</b> 62:16	36:23,25 37:25
<b>serial</b> 88:17 89:2,5	<b>sort</b> 81:1,15	54:4 55:5,6,18	<b>swear</b> 50:21	41:21,25 43:25
90:1	<b>sought</b> 95:12	56:4,6 57:5,6,7,17	<b>swore</b> 59:22	44:4 45:1,4,6,7
<b>series</b> 36:13	<b>sounds</b> 27:9	58:15 64:11,15,19	<b>sworn</b> 1:15 7:4	46:16,21 48:3,19
<b>services</b> 1:23 13:19	<b>speaking</b> 86:6	65:7,11 66:1	49:12 59:7 101:8	53:3,6,8,24 60:17
40:13,15	<b>specific</b> 13:17 24:7	68:19 69:17 71:21	<b>Swyers</b> 2:8 3:4 5:3	60:20 61:24,25
<b>set</b> 50:7 55:16	52:22 53:1 64:14	83:14 86:21 91:5	7:17,19 9:20 17:9	62:12 63:8,9 64:1
101:14	64:17,18,19 73:3	<b>status</b> 67:8 86:25	17:21 18:6,9,12	64:8 66:7,11 68:2
<b>setting</b> 8:1	<b>specifically</b> 13:24	92:10	30:24 34:1 35:24	68:5,6 71:8,11
<b>share</b> 40:8	16:8 23:15,16	<b>stay</b> 20:17 28:9	36:22 43:25 44:3	73:9,10 75:16,20
<b>shared</b> 40:9	30:18 37:10 62:13	72:19	46:20 47:22 48:9	76:10 77:5,8 78:9
<b>sheet</b> 68:25 69:11	84:19 97:5	<b>stenographically</b>	53:5,19 61:20	78:12,16,24 80:4
70:3	<b>specified</b> 29:1	101:12	62:11 63:2 64:5,7	89:3 97:24 98:2
<b>show</b> 35:21 36:23	<b>specimen</b> 97:9,11	<b>sticker</b> 80:1	66:4,9 67:20,25	99:23 100:10
41:23 60:19 68:3	<b>specimens</b> 97:3	<b>stipulated</b> 50:2,7	68:4 72:13,16	<b>team</b> 23:10 28:14

50:10	90:13 91:19 92:12	101:11	83:14 86:20,20	20:20,20 26:1
<b>TEAS</b> 4:4	92:24 95:21	<b>trustees</b> 25:4 26:24	91:4	30:17 35:21 36:14
<b>telephone</b> 2:7 9:8	<b>throw</b> 76:8	32:9 33:20 50:12	<b>university</b> 10:16,22	36:23 41:6 47:23
<b>tell</b> 8:9 11:12 23:14	<b>time</b> 11:10 49:13	83:5	<b>use</b> 19:17 24:9 49:5	48:20 49:4,7
32:14 36:15 41:10	61:18 65:12 73:24	<b>truth</b> 8:9 101:8,9,9	70:14,14 90:25	54:15 60:6 63:1
42:13,19 44:22	76:11 81:11,18	<b>turn</b> 42:16 66:20	91:4,7 93:10	68:24 69:25 70:3
47:2 65:3 66:12	83:1,6 93:8 97:23	69:10 70:2	95:23 96:1,4,7,11	71:3,24 72:13,20
66:13 80:11 81:22	99:7,12 101:13	<b>two</b> 15:11,15 20:18	96:20,20 97:3	73:11 79:4 94:4,8
82:9 84:5 86:15	<b>title</b> 16:4 18:18	30:21 38:23 43:5	<b>users</b> 88:15	100:1
88:4 93:13	<b>titles</b> 16:12	45:8,13,13 47:14	<b>usually</b> 20:16 35:1	<b>wanted</b> 82:24
<b>term</b> 22:5	<b>today</b> 8:1,25 9:8,25	66:25 68:25 69:1	<b>U-k-e-j-e</b> 85:1	<b>warning</b> 5:11 93:9
<b>terms</b> 30:8	23:4 49:4 64:23	75:4 82:5 83:22	<b>U-k-w-u-u[verba...</b>	93:17
<b>testified</b> 7:4 19:2	65:6 70:18 71:4	85:4 97:5	14:11	<b>wasn't</b> 67:12
20:24 23:13 31:13	84:22 89:14 99:1	<b>typically</b> 20:14	<b>U-k-w-u[verbatim</b>	<b>way</b> 8:13,24 10:8
32:15 34:2 36:12	<b>told</b> 38:22 39:2,5		14:24	18:5 29:15 30:15
48:22 56:3 65:24	58:2 59:22 66:21	<b>U</b>	<b>U.S</b> 27:14 80:22	52:10 57:3,5
86:4 93:4 97:8	73:12	<b>U</b> 6:1	81:13 87:11 88:17	100:4
98:3,24	<b>top</b> 32:10 86:9	<b>Ukwu</b> 14:9,19,23		<b>week</b> 12:9 33:6
<b>testify</b> 9:25 54:5,8	88:16,24	<b>ultimately</b> 89:11	<b>V</b>	<b>weeks</b> 20:18
54:23 55:1 101:8	<b>totally</b> 87:20	<b>um-hmm</b> 42:12	<b>Valerie</b> 12:11	<b>welfare</b> 13:21 35:3
<b>testimony</b> 48:13	<b>touched</b> 82:8	91:6	<b>Valley</b> 12:2	58:5
66:5,6 100:17	<b>town</b> 14:20	<b>unauthorized</b>	<b>various</b> 27:20 40:19	<b>West</b> 2:9
101:12	<b>trade</b> 98:8 99:7,7	88:15	100:3	<b>we'll</b> 9:7,14 24:3
<b>Texas</b> 33:12,15,15	<b>trademark</b> 1:1,1,3	<b>unclear</b> 8:24	<b>verbalize</b> 8:16	25:24 43:21,21
<b>thank</b> 7:20 17:21	2:8 5:12 19:15,17	<b>understand</b> 7:25	<b>Verde</b> 12:11	71:6,6 81:8 90:2
18:12 35:24 36:22	19:20,22 35:8,13	8:6,11,21 10:4	<b>verified</b> 48:16	94:1
44:3 46:20 48:18	37:14,17 38:12,17	18:20 27:18 32:19	<b>verify</b> 49:20 63:5	<b>we're</b> 8:1,1,19
53:5,23 61:23	64:22 65:2,5,25	32:20 56:3 64:12	92:9	17:13 18:24 19:23
68:4 73:8 75:19	66:1,14,15 67:3	64:25 70:11 98:13	<b>vice-presidents</b>	19:23 23:1 48:9
76:9 80:6	67:13,19 68:9,19	98:18	26:22	64:23 65:6 66:15
<b>Thanks</b> 30:24	69:4 71:22 83:15	<b>understanding</b>	<b>Vienna</b> 2:10	71:6 74:20 76:8
<b>that(REQUEST)</b>	87:17 88:15,19	94:11	<b>View</b> 4:15	78:21 86:6 89:14
64:2	93:5,10,18 94:13	<b>Understood</b> 30:3	<b>violation</b> 5:11	100:11,14
<b>thing</b> 16:16 99:25	94:17 95:2,3,14	63:8 73:9,9	87:16 93:17	<b>we've</b> 22:5 50:1
<b>things</b> 58:3,4,7	95:25 99:1,3,5,8	<b>Union</b> 14:12	<b>Virginia</b> 2:10	59:20,22,23,24
79:11 83:21	99:11,16,19,20,20	<b>United</b> 1:1 11:15	<b>visit</b> 20:4	79:8 82:8 89:24
<b>think</b> 29:12 43:6	<b>trademarks</b> 95:23	21:3,11,22 22:2	<b>voice</b> 9:9	91:9,18 96:18
47:10 63:23 72:12	<b>training</b> 11:7	23:2,4,20 24:6	<b>vs</b> 1:8	<b>white</b> 79:25
75:13 78:17,25	<b>transcript</b> 8:20	27:10,16,20 35:14	<b>V-e-r-d-e</b> 12:11	<b>wife's</b> 20:10,12
81:15 91:18	101:11	35:18 48:23 49:3		<b>wind</b> 59:9,9,15
100:11	<b>Treasury</b> 4:7 78:1	52:13 54:3 55:4,6	<b>W</b>	<b>winds</b> 57:13,13
<b>thousand</b> 43:5 67:1	<b>TRIAL</b> 1:1	55:18 56:4 57:4,6	<b>W</b> 3:1	<b>wished</b> 39:10
<b>three</b> 5:6,7 20:18	<b>tricky</b> 72:24	57:7,17 58:15	<b>Wah</b> 1:20 101:3,23	<b>withdrawn</b> 52:5
22:24 38:23 65:4	<b>true</b> 60:4 68:22	64:11,15,19 65:7	<b>wait</b> 9:10	86:23
69:6 73:16,23	81:4 82:1 87:21	65:11,25 68:18	<b>want</b> 7:15,24 8:25	<b>witness</b> 63:4 79:24
81:23 83:21,22	89:17 93:21,23	69:16,17 71:21	9:3,15,22 20:1,1,2	80:3 100:16

**word** 70:8  
**words** 8:18 12:15  
 50:3 54:18  
**work** 11:25 14:18  
 35:14 39:13 67:25  
 79:19 83:16  
**worked** 19:21  
**working** 30:10  
**Wright** 11:20  
**writing** 38:6,9  
**written** 38:13 41:5  
 64:11,14 81:25  
 85:22 93:15  
**wrote** 40:10 93:24  
**www.MagnaLS.c...**  
 1:24

**X**

**X** 3:1 4:1 5:1

**Y**

**yeah** 12:19 15:19  
 43:5,13 56:8  
 73:11 77:3 78:19  
 79:5 89:7 90:10  
 98:21 99:19 100:6  
**year** 10:24 17:3  
 20:6,7,9,11,13,13  
 51:16,17 66:9,12  
 75:12 80:17  
**years** 29:4 38:23,24  
 43:7 67:5  
**Yup** 53:6  
**y'all** 78:20

**\$**

**\$1,210** 38:14  
**\$5,000** 35:12 36:13  
**\$5,000.00** 4:17

**#**

**#130** 4:18

**0**

**000027** 5:6  
**000028** 5:8

**000030** 5:5  
**000033** 5:5  
**0037** 31:5  
**0048** 31:19  
**0049** 31:19  
**0068** 42:3  
**0069** 42:3  
**0070** 44:7  
**0084** 46:24  
**0166** 53:11  
**0182** 77:12  
**0202** 60:24  
**0203** 62:3  
**0211** 62:10  
**0212** 62:13  
**0218** 60:24  
**0236** 45:9 46:5,6  
**0237** 45:10  
**0258** 75:23  
**08648** 2:4  
**08820** 12:3

**1**

**1** 5:4 12:3 79:23  
 80:1  
**1pg** 4:11,21 5:9,10  
**1st** 51:16  
**10/31/06** 4:23  
**10:00** 1:19  
**100** 2:10 12:2  
**12:36** 100:17  
**130** 38:4  
**14** 88:5  
**151** 2:9  
**16** 11:20 42:24  
 44:13  
**17** 62:14 74:3  
**18** 23:4 62:14 93:16  
**19** 90:5  
**1971** 22:10 90:7,10  
**1972** 10:25  
**1974** 11:16,17  
**1977** 11:7,9  
**1990** 21:9,11,21  
 22:1 65:9,9,10,12  
 90:5 96:12

**1991** 80:20  
**1994** 96:1  
**1998** 11:23 75:13

**2**

**2** 1:13,18 2:3 5:6  
 6:3 81:20  
**2nd** 1:18  
**2pg** 4:10  
**2/18/15** 5:11  
**20** 50:4,17,18 51:14  
 51:18 73:20 92:20  
**2004** 72:6  
**2007** 75:5,6  
**2010** 20:24 21:2  
 30:21 32:17 33:5  
 33:7,21 34:25  
 36:10,17 37:6,17  
 38:5 40:11 41:2  
 56:12,19,22,25  
 65:8 66:18,25  
 67:1 83:8,18  
 91:10 94:12  
**2013** 22:23,25  
 38:22,25 41:4  
 43:5 65:23 73:19  
 73:20 92:20 93:16  
 95:9,10  
**2014** 42:24 44:13  
 72:9 73:22 74:3  
 86:11 88:5  
**2015** 1:13  
**21** 36:10  
**21st** 77:1  
**212** 43:6  
**22** 23:3  
**22180** 2:10  
**23** 37:6 38:5 40:11  
 41:2  
**25** 80:20 86:11  
**25/10/14** 5:9  
**26** 21:9,11 65:12  
**26th** 21:20  
**29** 67:1

**3**

**3** 5:7 81:20  
**3rd** 2:4  
**30** 80:2  
**30XI001936000**  
 101:24  
**30(b)(6)** 10:2  
**31** 80:2  
**32** 80:2  
**33** 80:2  
**344** 2:9

**4**

**4** 5:9 85:15  
**4,591,874** 1:3  
**42** 23:1,10  
**44** 22:21,22,24

**5**

**5** 5:10 88:3 89:6  
**5/5/15** 4:22  
**501e3** 35:15 83:15  
 83:23

**6**

**609.896.9060** 2:5  
**624-6221** 1:24  
**64** 6:3

**7**

**7** 3:3  
**7/14/14** 5:10  
**7/16/14** 4:10,11  
**79** 3:5

**8**

**8** 5:11 93:13,14  
**8/23/10** 4:18  
**800.906.8626** 2:10  
**86116372** 90:1  
**866** 1:24

**9**

**9/25/12** 4:21  
**98** 3:3  
**993** 1:17 2:3



PTO Form 1478 (Rev 8/2000)  
 OSB No. 0651-0008 (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	\\TICRS\EXPORT16\IMAGEOUT 16\861\163\86116372\xml1\FTK0002.JPG
*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 (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

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

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.

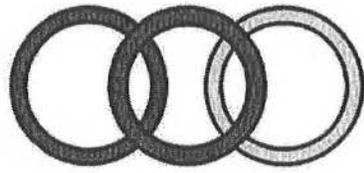
Signature: /Matthew H. Swyers/ Date Signed: 11/12/2013  
Signatory's Name: Matthew H. Swyers  
Signatory's Position: Attorney of Record

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

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

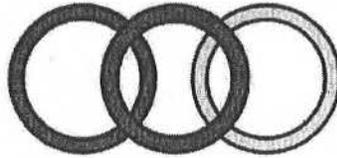
TEAS Stamp: USPTO/FTK-97.67.147.154-2013111213305958  
1554-86116372-500ef1a569a4eb1245882d374c  
1f4d52aace41fabb3697176bee1fa13d447ba9ba  
-CC-21819-20131112131702076350

# **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  
Iehic 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



## 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

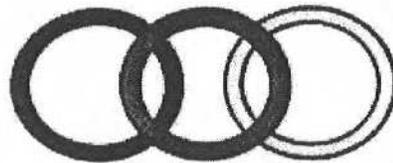
Signatory's Phone Number: 800-906-8626 x100

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  
3964-86116372-50078b2aafcda154048285f90e  
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*

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

PLAINTIFF'S  
EXHIBIT  
P-3

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

Andrew P. Sidamon-Bristoff  
State Treasurer

Certificate Number: 11758876

Verify this certificate online at

[https://www.treasury.nj.gov/TYTR\\_SimpliEngCertUSP/Verify\\_Cert.asp](https://www.treasury.nj.gov/TYTR_SimpliEngCertUSP/Verify_Cert.asp)

PLAINTIFF'S EXHIBIT  
P-4



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

NP  
FILED Rev. 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.

- 0101010702
- Name of Corporation: **PEOPLE'S CLUB OF NIGERIA INTERNATIONAL, INC.**
  - 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**

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

- The corporation shall have members.  Yes.  No. If yes, qualification will be:  
 as set forth in the bylaws.  or as set forth herein (attach).
- The rights and limitations of the different classes of members will be:  
 as set forth in the bylaws.  or as set forth herein (attach).
- The method of electing trustees will be:  
 as set forth in the bylaws.  or as set forth herein (attach).
- 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.				

- The duration of the corporation is: **PERPETUAL**
- 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  
**SEBASTIAN O. IBEZIM, JR.      936 BROAD ST, 2<sup>ND</sup> FL. NEWARK  
NEW JERSEY, 07102**

- Method of distribution of assets shall be:  as set forth in the bylaws.  or as set forth herein (attach)
- 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/INTERNATIONAL

**BANKERS:**  
First Bank of Nigeria Plc.  
Union Bank of Nigeria Plc.

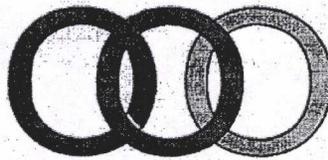
(REGISTERED IN NIGERIA)  
REG. NO. 1295  
STAKEHOLDERS

**NATIONAL HEADQUARTERS:**  
Onitsha/Owerri Road  
P.O. Box 5421  
Onitsha, Anambra State  
Tel: 046-322196  
E-mail Address: peoplesclubofnigeria@yahoo.com

Our Ref:.....

Your Ref:.....

Date Ref:.....



Motto: UNITY, LOVE & SERVICE

16<sup>th</sup> July, 2014

## NATIONAL/INTERNATIONAL OFFICERS

**President**  
Chief Sam Iwuchukwu

**1st Vice President**  
Chief (Dr) S. Ezenbakwe

**2nd Vice President**  
Chief (Dr) Chika Monanu

**3rd Vice President**  
Chief (Dr) C. Ashibogwu

**National Secretary**  
Hon. Alhaji A.N. Obinwa

**1st Asst. National Secretary**  
Nze Ben Okafor

**2nd Asst. National Secretary**  
Chief C. Onwukwufor

**National Financial Secretary**  
Chief (Sir) C.I. Ejeremwa

**Asst. Nat. Financial Secretary**  
Hon Philo Ohiri

**1st National Legal Adviser**  
Chief (Barr.) A.E. Enuma

**2nd National Legal Adviser**  
Chief (Barr.) J. Nwokocho

**3rd National Legal Adviser**  
Chief (Dr) John Oronsaye

**National Treasurer**  
Chief Lawrence Iloanya

**National Publicity Secretary**  
Chief Kennedy Nwalozie

**Asst. Nat. Publicity Secretary**  
Chief Cornelius Umeh

**National Protocol Officer**  
Chief Fidelis I. Akupue, JP

**Asst. Nat. Protocol Officer**  
Chief Hyacinth Oboh

**National Welfare Officer**  
Chief Willie Uzor

**Asst. Nat. Welfare Officer**  
Hon. Sally Amazechi Oumtey

**National House Master**  
Chief I.G. Ikem

**Asst. Nat. House Master**  
Hon. J. Ezeasor

**To:** All PCNI Branches,  
All Members of PCNI,  
Members of General Public.

## UN-AUTHORIZED USE OF THE NAME OF PEOPLES CLUB OF NIGERIA INTERNATIONAL

The attention of National Executive Committee (NEC) of Peoples of Nigeria International has been drawn to the letters dated July 14, 2014, and signed by Chief Dr. Sir J. I. Ilonze and Mr. Smart Ebere but sent on July 11, 2014, addressed to Dr. Iddi Mgbako and purportedly granting him authority to prosecute users of Peoples Club of Nigeria International Trademark Design and the second letter addressed to "All Branches of PCNI and the General Public in USA".

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, not to a few or selected individuals. Thus, any legal action instituted by any person(s) on the Trademark Design #86116372 shall be met by a counterclaim.

I urge any person or group of persons who think(s) otherwise to heed this advice and warning, and to use civilized remedies, and desist from intimidation and harassment of the PCNI members in their legitimate exercise of their freedom of association.

Members of Peoples Club of Nigeria International have the right to freedom of association and pursuit of happiness; they also have the legal right to use the Club Name and Logo in all meetings and events.

Peoples Club of Nigeria International 2014 Convention and Inductions in America was approved by both Club NEC and by General Membership at the Extraordinary General meeting of the Club Stakeholders held on the 19th April, 2014 at Onitsha. The convention is open to all peace loving and law abiding members of Peoples Club of Nigeria International.



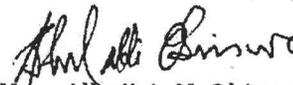
Petitioners 0068

I urge all law-abiding and peace-loving Members of our Club to remain calm and steadfast, and ignore any attempt to stop them from coming out en mass in exercise of their right to freedom of association and pursuit of happiness. Come to the 2014 convention and Induction ceremonies to have fun, network with other Club members in a spirit of love for one another and to serve each other and humanity in general.

It has been stated time and again that the current situation in the Club can only be resolved in a peaceful atmosphere based on dialogue, the principle of give and take and abiding faith in God, and the rule of law, not by intimidations, arm twisting and blackmail.

*Signed*

  
Chief Sam C. Iwuchukwu  
National President

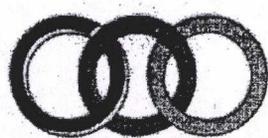
  
Hon. Alhaji A. N. Obinwa  
General Secretary

PLAINTIFF'S EXHIBIT  
P-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:**  
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: 16<sup>th</sup> July 2014

**NATIONAL INTERNATIONAL OFFICERS**

- President  
Chief Sir J. I. Ilonze
- 1st Vice President  
Chief Oyeleachi O. Obase
- 2nd Vice President  
Chief R. O. C. Ekechukwu
- 3rd Vice President  
Chief Sam Nwagwu
- National Secretary  
Elder Smart O. Ebere
- 1st Assistant National Sec.  
Chief C. C. Akpan
- 2nd Assistant National Sec.  
Lady Oke Anyanwu
- Financial Secretary  
Chief Paulina Okechukwu
- Legal Adviser  
Chief F. O. Oyeleke
- Assistant Legal Adviser  
Sam Olay Akpan
- Publicity Secretary  
Capt. J. O. W. Okeke
- Assistant Publicity Sec.  
Prof. Emma Opara
- Protocol Officer  
Chief Alan Opara
- Assistant Protocol Officer  
Hon. Don Ekeke
- Welfare Officer  
Chief Law Meje
- Assistant Welfare Officer  
Chief Gody Ono
- 2nd Assistant Welfare Officer  
Lady Ruby Nnaji
- 3rd Assistant Welfare Officer  
Mrs Bon Nwagwu
- House Master  
Chief Martin Ezeke
- Assistant House Master  
Chief Ernest O. Ugoji
- 2nd Assistant House Master  
Hon. Victor Ekeke
- 3rd Assistant House Master  
Hon. Asene Okeke

**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 Elobi 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. Odiako, Chief I. Ojukwu Ibe, HRM Igwe R.N. Nwankwo, Chief J.C. Okefor, Chief F. N. Okakaaru  
Address all correspondence to the General Secretary  
hon.smartebere@gmail.com (08066728872)

Petitioners 0070

# PEOPLES CLUB OF NIGERIA/INTERNATIONAL

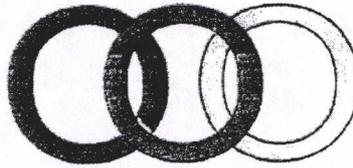
## BANKERS:

First Bank of Nigeria Plc.  
Union Bank of Nigeria Plc.

(REGISTERED IN NIGERIA)

REG. NO. 1295

STAKEHOLDERS



## NATIONAL HEADQUARTERS:

Onitsha/Owerri Road

P.O. Box 5421

Onitsha, Anambra State

Tel: 046-322196

E-mail Address: peoplesclubofnigeria@yahoo.com

Our Ref:.....

Your Ref:.....

Date Ref:.....

16th July 2014

## NATIONAL/INTERNATIONAL OFFICERS

### President

Chief Sam Iwuchukwu

### 1st Vice President

Chief (Dr) S. Ezembakwe

### 2nd Vice President

Chief (Dr) Chika Monanu

### 3rd Vice President

Chief (Dr) C. Ashibogwu

### National Secretary

Hon. Alhaji A.N. Obinwa

### 1st Asst. National Secretary

Nze Ben Okafor

### 2nd Asst. National Secretary

Chief C. Onwukwufor

### National Financial Secretary

Chief (Sir) C.I. Eierenwa

### Asst. Nat. Financial Secretary

Hon Philo Obari

### 1st National Legal Adviser

Chief (Barr.) A.E. Enuma

### 2nd National Legal Adviser

Chief (Barr.) J. Nwokeocha

### 3rd National Legal Adviser

Chief (Dr) John Oronsaye

### National Treasurer

Chief Lawrence Iloanyo

### National Publicity Secretary

Chief Kennedy Nwalozie

### Asst. Nat. Publicity Secretary

Chief Cornelius Umeh

### National Protocol Officer

Chief Fidelis I. Akupue, JP

### Asst. Nat. Protocol Officer

Chief Hyacinth Obob

### National Welfare Officer

Chief Willie Uzor

### Asst. Nat. Welfare Officer

Chief Sally Amazeachi Omaty

### National House Master

Chief G. Ikem

### Asst. Nat. House Master



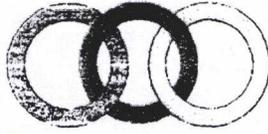
Petitioners 0236

# PEOPLES CLUB OF NIGERIA/INTERNATIONAL

CAC/IT/No. 1295  
Registered in Nigeria.

US Serial No. 86116372  
Registered in United States.

BANKERS:  
PNC Bank  
Zenith Bank of Nigeria Plc.



**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

MOTTO: *UNITY IS OVER A BELIEVER*

*Our Ref:*

*Your Ref:*

*Date:* 15/04/2015

## 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. EBERE

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

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 OFILI EGBUSI (KSM)

2nd Assistant Legal Adviser  
BARR. OKAY AKPOM

Publicity Secretary  
CAPT. J. O. W. ONYEMA

Assistant Publicity Sec.  
PROF. EMMA OPARA

Protocol Officer  
\*EF ALVAN OKOYE

Assistant Protocol Officer  
HON. BON IBEKWE

Welfare Officer  
CHIEF GODDY ORANEDO

Assistant Welfare Officer  
LADY RUBY NNADI

2nd Assistant Welfare Officer  
NZE BON IKWUAGWU

3rd Assistant Welfare Officer  
BRO. GODWIN ADIEME

4th Assistant Welfare  
CHIEF S. O. IGBOAMAEZE

House Master  
CHIEF MARTIN EZEIKE

Assistant House Master  
CHIEF ERNEST O. UGORJI

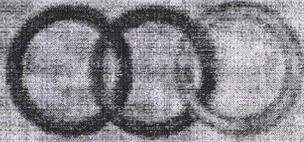
2nd Assistant House Master  
HON. VICTOR IHEZIE

3rd Assistant House Master  
HON. ANANE OKEKE



**PEOPLES CLUB OF NIGERIA INTERNATIONAL  
ORLU BRANCH**

**BANKERS**  
Union Bank of Nigeria Plc.  
Orlu



Wise. LIVE. LOVE & SERVE

P O Box 535  
Orlu  
Imo State

*22<sup>nd</sup> Feb. 2014*

**PEOPLES CLUB OF NIGERIA INTERNATIONAL (PCNI)  
CURRENT HAPPENINGS  
ORLU BRANCH VIEW**

We the members of Orlu Branch of our noble club, Peoples Club of Nigeria International seeing what is going on in the club as of now resolves as follows:

- (1) The purported election of national officers on the 21<sup>st</sup> day of December 2013 was not done according to our club's constitution. The constitution was very clear on the issue of election of officers and the said election of 21<sup>st</sup> December 2013 was not done in accordance with the said rules. The election is not accepted by Orlu Branch.
- (2) We resolved not to do anything with the officers of that sham election and advice that a new election be conducted based on the laid down rules of the club.
- (3) We want peace to return to the club as soon as possible for all to enjoy the benefit of being members of the noble club.

Lawrence Iloanya  
Chairman

*20/2/2014*

Signed:

Donatus Nwaokike  
Secretary

*20/2/2014*

**PLAINTIFF'S  
EXHIBIT**  
P-10



Houston, 21st August 2010

PEOPLES CLUB OF NIGERIA INTERNATIONAL

ACKNOWLEDGEMENT OF THE RECEIPT OF THE  
SUM OF \$5000.00

I Idi, Dr Ambrose Ngbako hereby acknowledge the receipt of the sum of \$5000.00 (Five thousand dollars) from Chief Sam C. Iwuchukwu to cover the following expenses to be incurred on behalf of Peoples Club of Nigeria International in USA :-

- Fee for 501(c)(3) Application and filing of Peoples Club International
- Legal fees and other sources for the registration of Peoples Club International in USA.
- Trademark registration (three rings etc)

Signed : .. *A. Ngbako* ..  
Idi Dr Ambrose Ngbako

Date .. August 21, 2010 ..



*Ambrose O. Mgbako, M. D.*

100 Valley Road,  
Montclair, NJ 07042

ABPN Certified - Psychiatry, Addictions Psychiatry  
ASAM Certified - Addictions Medicine

Tel.: 973-783-8070  
Fax: 973-783-8777

August 23<sup>rd</sup>, 2010

Sebastian O. Ibezim Jr. Esq.  
936 Broad Street, 2<sup>nd</sup> Floor  
Newark, NJ 07102

Re: Trademark Application for PCNI Inc.

Dear Mr. Ibezim,

Please find enclosed a check for \$1210 for the Trademark application for PCNI, Inc.

Yours very truly,

*Ambrose O. Mgbako*  
Ambrose O. Mgbako

AMBROSE O. MGBAKO MD.  
DEBORAH MGBAKO  
16 WRIGHT ST.  
EDISON, NJ 08820-1018

130

Date 8.23.2010

65-760/0312  
051

Pay to the Order of Klauber and Jackson LLC \$ 1210.00

One thousand two hundred and Ten Dollars

**PNC BANK**

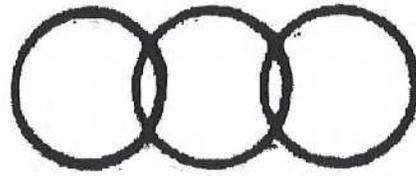
PNC Bank, N.A. 060  
New Jersey

Premium  
Plan

For Trademark application

*Ambrose O. Mgbako*

⑆031207607⑆ 8101100277⑈ 0130



# People's Club

CONSTITUTION

BYE - LAWS

AND

STANDING ORDERS

**CONTENTS**

ARTICLE	SUBJECT MATTER	PAGE
1.	Name .....	1
2.	Aims and Objects .....	1
3.	Headquarters .....	1-2
4.	OFFICERS:— Elected Officers Appointed by National Executive Committee Auditors .....	2 2-3 2-3
5.	Auditors Appointed by General Meeting .....	3
6.	Duties of Officers .....	3,4,5,6&7
7.	Admission of New Members .....	7
8.	Procedure & Induction Ceremony .....	7-8
9.	Election of Officers .....	8
10.	Terms of Office .....	8-9
11.	Qualifications for Election into the various offices at the National Level .....	9
12.	Disqualification of National Officers .....	10
13.	Committees .....	10-11
14.	Meetings .....	11-12
15.	Trustees .....	12-13
16.	Bankers .....	13-14
17.	Signatories to the Bank Account .....	14
18.	Rights & Privileges .....	14
19.	Loss of Benefits & Membership of the Club .....	15-16
20.	Suspension of Members .....	16
21.	Death of Members .....	16-17
22.	Application of Clubs Funds or Property .....	17
23.	Establishment of Branches .....	17-18
24.	Branch Regulations .....	18
25.	Honours Register & Photographs .....	18
26.	Winding Up or Dissolution of the Club .....	18-19
	Amendments .....	19
	Special Clause .....	19-20

P.T.O.

**CONTENTS**

TYCLE	SUBJECT MATTER	PAGE
	<b>BYELAWS</b>	
	National Executive Committee	21
	Election of Officers	22
	Validity	22
	The Place of Natural Rules	23-24
	Amendment	24
	Conflict	24
	<b>STANDING ORDERS</b>	
	Procedure for Induction Ceremony	25
	Induction Ceremony	26-27
	Funeral Ceremony	27-28
	Meetings	28,29,30
	Contributions, Levies and Collections	30-31
	Regulations	31,32,33

**PEOPLE'S CLUB OF NIGERIA**

CONSTITUTION

1. NAME:

The Club shall be known as and called "**THE REGIST TRUSTEES OF PEOPLE'S CLUB OF NIGERIA**".

2. AIMS & OBJECTS:

The Club is a social organisation and as such its aims and shall be:

- (a) To provide and promote recreational and social am activities for, and understanding among, its meml particular and the members of the public in t
- (b) To provide club houses at various branches of the
- (c) To provide and establish social, welfare and enteria centres and institutions for the members in particular community in general.
- (d) To provide members with benefits where necessary assistance and relief in sickness, accident, disableme distress.
- (e) To make periodic contributions for the advanceme promotion of charitable or benevolent activities and sations in the country.
- (f) To affiliate or co-operate with any other Social Club: country having similar aims and objects as People's ( Nigeria.
- (g) To creat and encourage the creation of an endowme and to raise fund either by borrowing or by fund activities within the limits permitted by law for the f of carrying out all or any of the above mentioned

3. HEADQUARTERS:

The Headquarters of the Club shall situate at Onitsha or other place as may from time to time be decided at General Meetings.

**OFFICERS:**

The Club shall have the following officers:-

**Elected Officers:**

- (a) President (Chairman)
- (b) 1st Vice President
- (c) 2nd Vice President
- (d) 3rd Vice President
- (e) 1st National Legal Adviser
- (f) 2nd National Legal Adviser
- (g) National Secretary
- (h) 1st Assistant National Secretary
- (i) 2nd Assistant National Secretary
- (j) National Financial Secretary
- (k) National Treasurer
- (l) National Publicity Secretary
- (m) National Protocol Officer
- (n) National Assistant Protocol Officer
- (o) National Welfare Officer
- (p) National Assistant Welfare Officer
- (q) National House Master
- (r) National Assistant House Master

**ii. Officers Appointed by National Executive Committee Every Year:**  
Auditors.

iii. Patrons who are special officers for life nominated by branches or who are retired National Presidents after two terms of office of 3 years each and approved by the National Executive. They are free to choose any name on installation.

**iv. Officers Appointed by General Meetings:-**

- The Registered Trustees of the Club.
- Special National Officers. (Under section 8(iii)-below).

**5. DUTIES OF OFFICERS:**

**i. Elected Officers:**

- (a) **President:** He shall direct the affairs of the Club and preside at all general, executive and extra ordinary general meetings and other social engagements of the Club which are on National level. He shall have a casting vote at meetings
- (b) **Vice President:** There shall be three Vice Presidents in the order of 1st, 2nd and 3rd Vice Presidents. Not more than one Vice President shall be elected from one branch and none shall be elected from the branch from which the President is elected. They shall assist the President and deputise for him in his absence.
- (c) **National Legal Adviser:** There shall be two National Legal Advisers, 1st and 2nd National Legal Advisers. They shall advise the executive in particular and the Club in general on all legal and constitutional issues affecting the Club. They shall be ex-officio members of any Committee, Ad-hoc or otherwise established by the National Executive Committee.
- (d) **National Secretary:** He shall be responsible for the Secretarial duties of the Club and in particular record minutes of all meetings of the Club, deal with

correspondences and shall submit annual written report approved by the National Executive Committee on the activities of the Club.

e) **1st & 2nd Assistant National Secretaries.** There shall be two Assistant National Secretaries, 1st and 2nd. They shall assist the National Secretary and deputise for him in his absence.

f) **National Financial Secretary.** He shall be responsible for collecting monies payable to the Club, issuing receipts and paying same over to the National Treasurer. He shall be responsible for proper record of income and expenditure of the Club, and shall prepare an annual financial statement of accounts. It shall be his duty to notify branches of any default on their part to pay any outstanding dues. He shall at the request of any Auditor or Auditors appointed by the Club produce his books for inspection and audit.

g) **National Treasurer.** He shall receive and issue receipts for all monies of the Club collected through the National Financial Secretary. He shall keep a cash book in plain and correct figures. He shall keep the custody of all the Club Bank Books. He shall produce his cash book for auditing together with all other relevant papers at the request of any Auditor or Auditors appointed by the Club.

j) **National Publicity Secretary.** He shall be responsible for issuing releases on behalf of the Club. He shall publish and issue press releases in respect of all matters approved by the Club or the National Executive Committee.

**National Protocol Officer and His Assistants.** They shall be responsible for accommodation of National Officers and Executives as well as general maintenance of order

of protocol or sitting arrangements at all National Meetings, ceremonies and functions, engagements including funeral ceremonies, installation of Patrons and other occasions when the National body is required to attend as such. They have no right to interfere in branch functions including induction ceremonies unless requested by the branch.

(i) **National Welfare Officer and His Assistants:** They shall be responsible for the welfare of the Club members which includes ensuring that adequate food, drink and victuals are provided and properly and fairly distributed at all National ceremonies, functions and engagements including general meetings, funeral ceremonies, installation of Patrons and other occasions when the National body is required to attend as such. They have no right to interfere in branch functions including induction ceremonies unless requested by the branch. They shall account for any surplus of drinks during National functions.

(k) **National House Master and Assistant:** They shall be responsible for maintenance of Law and Order at National Executive and General Meetings and security of members and their vehicles at all engagements of the National Body. They shall co-operate with the National Welfare Officers in ensuring proper custody of Club property.

ii) **Officers to be Appointed by National Executive Committee:**

**Auditors:** Competent members shall be appointed before the end of every year and before the annual General Meeting by the Executive Committee to audit the books of the Club. They shall submit their report for debate at the annual general meeting of the Club

Patrons:

Special Officers for Life:

- (a) Any financial and other member certified as such by his branch and has been a member of the Club for not less than five years may apply through his branch to the National Executive for the office of Patron.
- (b) On receipt of the application, the National Secretary shall present the application to the next meeting of the National Executive Committee for consideration.
- (c) In considering the application, the National Executive shall take into consideration the following factors:
  - (i) The applicant's character and social status.
  - (ii) His contributions to the Club.
- (d) The number of Patrons at any given time shall not exceed 12 without prejudice to the appointment of Retired Presidents, National Lord or any special concession by the National Executive.
- (e) There shall be no branch Patrons.
- (f) A Patron shall not hold any elective office of the Club except the office of Trustee.
- (g) A retired President as stated above shall be conferred with a title of Patron as mark of honour for his meritorious services to the Club at a ceremony to be arranged by the National Executive Committee. He shall however pay a token fee for registration of his title as may be decided by the National Executive Committee.

to. *The Registered Trustees of the Club: They shall be members of the National Executive Committee and may hold any other office.*

6. ADMISSION OF NEW MEMBERS:

- (i) Admission of new members shall be at the branch level but before admitting any new members the branch shall ensure that the applicant satisfies the following conditions:-
  - (a) He must be over 21
  - (b) He has a visible means of livelihood
  - (c) His character is unquestionable
  - (d) He has never been convicted of a criminal offence involving fraud or dishonesty
  - (e) No female applicant can be admitted unless she is single or has been legally divorced from her husband or her husband is dead.
  - (f) Both husband and wife cannot be full members of the People's Club as herein defined.
  - (g) When a man marries a woman who becomes a member of People's Club after the date of coming into effect of this Constitution the woman shall renounce her membership in favour of her husband, failing which she will be expelled.
  - (h) She is not a former wife of a member.

(ii) Procedure & Induction Ceremony:

Every candidate for membership shall be proposed on the Club's approved form and seconded by at least two members of the Club. Thereafter, if his/her candidature is approved by the branch to which he/she applies for membership, he/she shall be admitted after induction ceremonies of the branch.

**(iii) Registration of New Members**

On admission, the new member shall be registered by the branch with the National Secretariat.

**7. ELECTION OF OFFICERS:**

Every office except those of Auditors, Patrons and Trustees are elective. Election of officers shall be by secret ballot after the reports of the Auditors, the Secretary and the National President. Any vacant position in the course of the three years shall be filled at the next immediate annual general meeting but the National Executive Committee may, before the Annual General Meeting appoint any acting officer.

**8. TENURE OF OFFICE:**

(i) Every elected officer holds office for three years from the Annual General Meeting at which all officers are elected to the third General Meeting after that but would be eligible to offer himself for re-election for another term of office of three years.

(ii) Except for the Trustees, no elected officer can hold the same office for more than two terms of office of three years each, save that a National President who had held office creditably for successive two terms of three years each, shall be conferred with title of Patron in compensation for his services. Other officers can after two successive terms of office in the same office vie for election into a different office. The provision of this section shall not have retrospective effect thus, the two terms of office shall have effect from the date of approval of this amendment unless a particular officer decides not to offer himself for re-election.

(iii) The first set of the National Officers shall on relinquishing their offices under the provisions of this section be appointed

permanent members of the National Executive Committee of the Club and designated 'Special National Officers' as a mark of recognition of their contributions to the founding of the Club.

(iv) The provision of sub Section I-III above shall mutatis mutandis apply to branch officers except that every retiring branch Chairman or Secretary shall remain a permanent member of the branch Executive Committee.

**9. QUALIFICATION FOR ELECTION INTO THE VARIOUS OFFICES AT THE NATIONAL LEVEL**

(a) The Club adopts generally the principle of seniority based on the date of admission into the Club.

(b) To qualify for various National Offices, the candidates must satisfy the following conditions:

(i) Generally they must possess certificates from their branches of being active and financial members of their branches.

(ii) For the post of President and Vice Presidents, they must have been active and financial members of the Club for a minimum period of five years.

(iii) Other elective officers - a minimum period of five years.

(iv) Patrons and Trustees - a minimum period of five years.

(v) Branch Chairmen and their officers who are members of the National Executive by virtue of their position at the branches, if they have not been members of the Club for a minimum period of three years shall not be entitled as of right to seats at the rostrum during functions unless there is ample space.

10. DISQUALIFICATION OF NATIONAL OFFICERS:

*A National Officer shall cease to hold office before the expiration of a term of three years if he:-*

- (i) Resigns his office;
- (ii) Becomes insane;
- (iii) Is officially declared bankrupt;
- (iv) Is convicted of a criminal offence involving fraud or dishonesty by a Court of competent jurisdiction.
- (v) He is recommended by the National Executive for removal from office and such recommendation is carried by a two-third majority votes of members present at the next General Meeting of the Club.
- (vi) He ceases to reside in Nigeria.
- (vii) He is found guilty of misconduct by his branch and a report of the finding is made to the National Executive which upholds the decision of the Branch.

11. COMMITTEES:

(a) *National Executive Committee:* The National Executive Committee shall consist of all the officers, Trustees, Patrons and one representative from each branch for the first 100 or less and one additional representative for every other hundred. The list of the branch executives shall be deposited with the Secretary and amended as the branches may from time to time decide. The Executive Committee shall have powers to deal with the following matters:-

- (i) Resolution of disputes between branches and in case of individuals by way of petitions from branch decisions.

(ii) *General Management of the Club on national level:* including dealing with such matters as may be specifically referred to it by the General Meeting. Its decisions are, except in cases of emergency and in all non-constitutional matters, subject to ratification by the General Meeting.

(b) *Ad Hoc Committees:* Ad Hoc Committees may be set up at the General Meetings or by the Executive Committee to deal with such matters as may be referred to them and shall stand dissolved on submission of their reports unless re-appointed by the same matter or any other matters. Their power shall be limited to the terms of reference on appointment.

(c) *National Advisory Committee:* National Advisory Committee is to advise the National Executive Committee on National Policy Matters. It is also the Finance Committee of the Club and in that capacity takes responsibility for the finances of the Club which includes raising, collecting, controlling and investing all Club's funds. Their decisions are subject to ratification by the National Executive Committee before implementation except in cases of emergency. The membership shall be limited to the National President, Vice Presidents, Trustees, Patrons, Legal Adviser and his Assistant, National Secretary, National Treasurer and his Assistant, National Secretary and three other members of the Club co-opted by the National Advisory Committee.

(d) *Committee of Registered Trustees:* The Registered Trustees of the Club shall be responsible for the overall management of all the Club's Real properties and for that purpose the shall be constituted into a Committee of the Club and shall hold meetings at least twice in a year.

12. MEETINGS:

(a) Annual General Meetings:

Annual General Meetings shall be held once a year in the

month of October at the Club House, Okitipupa, Oritipupa. At least twenty-one (21) days before the date of Annual General Meeting of the Club shall be given to all members through their branches by the National Secretary in addition to publication in Daily Newspapers to be approved by the National Executive Committee.

#### Quorum at Meetings:

- (i) General Meetings: A number of members not less than 100 present within 30 minutes after the scheduled time for the meeting shall form a quorum provided that such members represent not less than 2/3 (two-thirds) of the number of all the branches of the Club.

Extra Ordinary General Meetings: Extraordinary General Meetings of all the members shall, subject to fourteen (14) days notice, be summoned by the General Secretary on the order of the National Executive or National President.

National Executive Committee Meetings: The Executive Committee meeting shall be held at such time and place as the President shall decide.

#### TRUSTEES:

The Trustees of People's Club of Nigeria for the purpose of Land (Perpetual Succession) Act, Chapter 98 shall be appointed at a General Meeting of which at least 14 days notice was given.

Quorum at such meeting shall be any number of members not less than one hundred (100) present fifteen minutes after the scheduled time for opening the meeting. Such Trustees (*herein-after referred to as "THE TRUSTEES"*) shall be six in number and shall be known as "*THE REGISTERED TRUSTEES OF THE PEOPLE'S CLUB OF NIGERIA*". In the absence of any act of misbehaviour or disqualification (c) hereunder every trustee shall be entitled to be re-appointed for another period of 5 years after the expiration of the previous period of five years.

(c) The Trustees may hold office for five (5) years but a Trustee shall cease to hold office if he:-

- (i) Resigns his office
- (ii) Ceases to be a member of the registered Trustees of the People's Club of Nigeria.
- (iii) Becomes insane
- (iv) Is officially declared bankrupt
- (v) Is convicted of a criminal offence involving dishonesty by a Court of competent jurisdiction.
- (vi) Is recommended for removal from office by a two-third (2/3) majority votes of members present at an General Meeting of the People's Club of Nigeria
- (vii) Ceases to reside in Nigeria

(d) Upon a vacancy occurring in the number of Trustees, General meeting will be held to appoint another eligible member of the People's Club of Nigeria.

(e) The Trustees shall have a Common Seal.

(f) Such Common Seal will be kept in the custody of the National Secretary who shall produce it when required for use by the Trustees.

(g) All documents to be executed by the Trustees shall be signed by at least any four of them and sealed with the Common Seal.

(h) The Trustees shall apply to the Minister for Certificate of Incorporation under the Land (Perpetual Succession) Act Chapter 98.

(i) If such certificate is granted, the Trustees shall have power to accept and hold in trust, all land belonging to the People's Club of Nigeria subject to such condition as the Minister may impose.

#### 14. BANKERS:

The Club shall appoint one or more Banks as the Bankers to the

Club. All funds received by the Secretary shall immediately be paid over to the Treasurer, who shall deposit the same in the Bank of Montreal. The Secretary shall keep in his possession a receipt for every sum so paid, and the Treasurer shall forward a receipt for every sum so received to the Secretary.

**STATUTES TO THE BANK ACCOUNTS.**

The President and Secretary shall be the authorized signatories to the Club's Bank Accounts. With a view to the Bank Accounts shall be in the possession of the President and any one of the other signatories. In the absence of the President, approval through to the Secretary, the Vice-President or Treasurer, any one of the signatories authorized by the National Executive as one of the signatories to the account.

**RIGHTS & PRIVILEGES:**

- (a) *Full Members* Full members are those admitted on their own right, who are entitled to all the rights and privileges provided in the Constitution.
- (b) *Honorary Members*: Wives of full members shall be called honorary members. They shall be exempted from contribution of all dues of the Club, but they may attend at all social ceremonies and other engagements of the Club. On the death of their husbands, honorary members may apply to become full members and the branch may admit them if satisfied on their payment of National Registration fee. They are not required to pay any further fee or go through induction ceremony.
- (c) *Recognition of Honorary Members* The Club shall recognize the wife of a member in case of a member having more than one wife as an honorary member.

**LOSS OF BENEFITS & MEMBERSHIP OF THE CLUB:**

A member shall lose his benefits and membership of the Club in the following ways:-

- (a) *Resignation* He resigns from the Club.
- (b) *Expulsion* A member shall be expelled from the Club on the following grounds if he/she:-
  - (i) Ceases to be a financial member of his branch for a period of one year.
  - (ii) Regularly absents himself from the meetings and other engagements of the branch Club for a period of one year without acceptable excuse.
  - (iii) He defrauds, dupes, cheats, deceives or makes false claims or declaration to any member of the Club or the Club itself.

(iv) Does anything which is calculated to bring the Club to disrepute or if by his conduct the branch shall be of the opinion that he is thereby rendered unfit for membership of the Club. Before any such member is expelled the Secretary of the Branch shall give him at least seven days written notice to attend a general meeting of the branch at which the causes of the complaints against him shall be discussed. No member shall be expelled under this subsection without first having an opportunity of appearing before the branch at its general meeting and answering the complaints made against him or unless at least two-thirds of the members of the branch then present vote in favour of his expulsion. He may however be expelled if after receiving due notice of the meeting at which the complaints against him shall be discussed he shall fail to attend the meeting. Resignation, suspension or expulsion of a full member carries with it the resignation, suspension or expulsion of his wife. On resignation, suspension or expulsion, the member shall forfeit all contributions she must have made to the Club.

Letters of resignation shall be submitted to and accepted by Branches. Right of expulsion and acceptance of resignation shall be exercised by the branches with notice to the National Secretary for information of other branches.

#### SUSPENSION OF MEMBERS:

- (a) A member may be suspended indefinitely for a breach of any of the provisions of the constitution.
- (b) A suspended member and his wife shall not be entitled to the benefits, rights and privileges conferred on him by this Constitution during the period of his suspension.
- (c) Notice of suspension of a member shall be given by the branch suspending him to the National Secretary who, shall soon after receipt of such notice, inform all the branches of the suspension of the member.
- (d) A member suspended or expelled from the Club can appeal against the decision of the branch suspending or expelling him to the National Executive Committee by way of petition within two months of his suspension or expulsion. The National Executive Committee after considering the petition including direct evidences from the suspended or expelled member shall refer its decision for ratification or rejection to the next general meeting of the Club, the decision of which on the case shall be final.

#### 2. DEATH OF MEMBERS:

- (i) On the death of a member or his wife, the branch to which he/she belongs shall immediately inform other branches of the funeral arrangements and all members shall endeavor to attend the funeral. The primary responsibility for arrangements at such funerals shall be that of the branch.
- (ii) *Comorientes.* Where a man who is a full member of the Club dies at the same time with his wife, the Club shall be

bound to make only one contribution and attend one funeral. Death benefit shall be paid to the next of kin as if only one of them had died.

- (iii) On the death of a member or his wife, the surviving husband or wife or in the absence of either, the next of kin of the deceased shall be given at the funeral ceremony the cash death benefits in trust for himself or herself and all the children of the deceased.

#### 20. APPLICATION OF CLUBS FUNDS OR PROPERTY:

- (a) No money or property of the Club or any sum arising from the carrying on of the Club shall be applied otherwise than for the benefit of the Club as a whole or for some charitable or benevolent purpose or purposes chosen by the resolution of Annual General Meeting or by the National Executive Committee.
- (b) *Investment of the Club's Fund:* The National Executive Committee shall have power to invest the funds of the Club in any way considered by it to be in the best interest of the Club as a whole.

#### 21. ESTABLISHMENT OF BRANCHES:

Branches of the Club may be established in any part of the Federation of Nigeria provided that the members of the proposed branch shall not be less than fifty out of whom at least ten of them must have been active members of the Club at any one or more of its branches. The proposed Chairman of the new Club must have been a member of another existing branch of the Club for a minimum period of three years and must present a Certificate from his former branch that he has been an active and continuous member of the branch. The fifty people who have satisfied the above requirements shall write the National Secretary indicating their intention to form a branch of the Club. On receipt of such letter, the National Secretary shall present it to the National Executive Committee for consideration

- and approval. Before considering the letter, the Executive Committee must approve of the candidatures of the attending members. If the Executive approves the candidatures of the intending members, it shall give approval for the establishment of the branch on a date to be advised to the intending members. The Executive Committee shall be fully represented on the establishment ceremony of the new branch and shall also present instruments establishing the branch as one of the branches of the Club and induct the new members on payment of their respective minimum membership fees. National registration fees and other induction fees. Thereafter, the National Secretary shall inform all the branches of the establishment of the new branch. No new branch shall be established in any place which the Executive Committee considers near enough to an existing branch as to make it unnecessary for a new branch to be established at such a place.

22. BRANCH REGULATIONS:  
Every branch shall have its local regulations for easy and smooth running of the branch activities but no provision of such rules and regulations shall derogate from, nor shall it be repugnant to any of the provisions of this Constitution. Copies of such Regulations shall be delivered by the branches to the National Secretary.
23. HOURS REGISTER & PHOTOGRAPHS:  
There shall be maintained at the National Headquarters of People's Club of Nigeria a Register called - **PEOPLE'S CLUB OF NIGERIA REGISTER OF HONOURED MEMBERS**. The names in the Register shall be engraved in marble on a conspicuous part of a wall at the Club Headquarters. Photographs of specially honoured members will be allowed to be displayed at the National Headquarters.
24. WINDING UP OR DISSOLUTION OF THE CLUB:  
The Club shall be wound up or dissolved on the happening of any of the following events that is to say:-

- (a) The members of the Club in all the branches put together fall below 50 (fifty).
- (b) Sixty (60) days written notice of a resolution to wind up or dissolve the Club is received and passed at any General Meeting of the Club by 2/3 (two-thirds) majority of all the members on the roll of the Club.
25. AMENDMENT:  
No alteration, addition or amendment to this constitution shall be made except by a resolution carried by a majority of at least two-thirds of the members present at any General Meeting. The notice of a motion for amendment of any of the provisions of this constitution shall contain particulars of the proposed alteration, addition, or amendment. At least 60 (sixty) days notice of any motion for addition, alteration or amendment shall be given before the Annual General Meeting. Such addition, alteration or amendment shall not take effect unless the same shall have been previously submitted to and approved by the Minister.
26. SPECIAL CLAUSE:  
**THE INCOME AND PROPERTY** of the People's Club of Nigeria whensoever derived shall be applied solely towards the promotion of the Objects of the People's Club of Nigeria as set forth in this Constitution. **AND** no portion thereof shall be paid or transferred directly or indirectly, by way of dividend, bonus or otherwise howsoever by way of profit, to the members of the People's Club of Nigeria.
2. **PROVIDED** that nothing herein shall prevent the payment, in good faith, or reasonable and proper remuneration to any officer or servant of the People's Club of Nigeria or to any member of the People's Club of Nigeria in return for any service actually rendered to the People's Club of Nigeria but so that no member of the Council of Management or Governing Body shall be appointed to any salaried office of the People's Club of Nigeria paid by fees; and that no remuneration or other benefit in money

1. NATIONAL EXECUTIVE COMMITTEE:

- (a) Every branch of the Club shall be represented on the National Executive Committee.
- (b) A member of the National Executive Committee nominated from a branch shall keep the branch informed of all the activities of the Executive Committee and furnish a regular link between the two bodies.
- (c) Minutes of the National Executive Committee shall as soon as possible after any meeting of the Committee be circulated personally to all the members of the National Executive Committee with one copy to each branch.
- (d) Members of the National Executive other than Patrons, Trustees and National Officers shall be nominated by their branches and shall remain in office for a term of three years as other elected officers unless they are withdrawn by the branches nominating them in substitution with other nominees. On establishing a new branch, that branch shall immediately nominate its representatives on the National Executive as stated in the Constitution. Branch Chairmen who are members of National Executive are there as members of the Executive and shall not by virtue of being members of the National Executive take precedence over other members of National Executive whether they are national officers or not.
- (e) All members of the National Executive Committee and other standing or ad hoc national committees shall obey the directions, instructions, decisions etc., of the General Meeting of the Club.
- (f) Any member of the National Executive or other National Committees who is unable or unwilling to carry out such directives or instructions or decisions etc., shall be removed

if moneys shall be given by the People's Club of Nigeria to any member of such Council of Governing Body except repayment of out-of-pocket expenses of reasonable and proper rent for premises demised, or let to the People's Club of Nigeria provided that the provision last aforesaid shall not apply to any payment of any Company to a member of the People's Club of Nigeria may be a Company in which such member shall not hold more than one-hundredth part of the capital, and such member shall not be bound to account for any share of profits he may receive in respect of any such payment.

1. **NO ADDITION**, alteration, or amendment shall be made to or in the Constitution for the time being in force, unless the same have been previously submitted to and approved by the Minister.

2. In the event of a winding up or dissolution of the People's Club of Nigeria there remains, after the satisfaction of all its debts and liabilities, any property whatsoever, the same shall not be paid to or distributed among the members of the People's Club of Nigeria but shall be given or transferred to some other institution or Institutions, having objects similar to the objects of the People's Club of Nigeria and the body or bodies are prohibited from distributing its or their income and property among its or their members to an extent at least as is imposed on the People's Club of Nigeria under or by virtue of the **SPECIAL CLAUSE** hereof, such Institution or Institutions to be determined by the members of the People's Club of Nigeria at or before the time of dissolution and if in so far as effect cannot be given to the aforesaid provision then to some charitable object.

**APPROVED AT THE EXTRAORDINARY GENERAL MEETING OF THE CLUB HELD AT ONITSHA ON THE 28TH DAY OF SEPTEMBER, 1979.**

SGD  
 NATIONAL SECRETARY  
 NATIONAL LEGAL ADVISER

SGD  
 NATIONAL PRESIDENT

from such committee by two-thirds majority vote of the National Executive Committee in the case of the Executive Committee and simple majority in the case of other committees.

## 2. ELECTION OF OFFICERS:

- (i) To qualify for election as a national officer the member must have been a continuous member of the Club for the minimum period stipulated in the Constitution.
- (ii) Officers shall be vacant by expiration of time, death, resignation, removal, revocation or any other reasonable cause.
- (iii) Any vacancy in-between annual general meetings shall be filled by the national executive committee.
- (iv) A candidate for election to any office shall be proposed and seconded by financial members.
- (v) All election of officers shall be by secret ballot.
- (vi) To qualify as a voter, the member must be a financial member of his branch.
- (vii) Ad hoc electoral officers, a minimum of three and a maximum of five, one of whom shall preside, shall be appointed by annual general meeting to conduct general election of officers.
- (viii) The presiding electoral officer shall have the powers of the Chairman under the standing orders.

## 3. VALIDITY:

Validity of proceedings of an annual general meeting shall not be affected by any office vacancy or by any defect in the appointment or election of members or officers or by any irregularity in the proceedings.

## 4. THE PLACE OF NATURAL RULERS:

A natural ruler is one who is recognised by the Government of his State as a Chief and natural ruler of his town. A natural ruler who is a member of People's Club of Nigeria shall be accorded a special status as hereinafter defined on his satisfying the under mentioned conditions:-

### (a) Conditions to be satisfied by Natural Rulers:

- (i) He shall satisfy by proof to the National Executive that he is a recognised natural ruler of his town.
  - (ii) He must at all times be a financial member of his branch.
  - (iii) He shall register his title with the National Secretariat with the sum of ₦100.00 (One hundred naira) if he had been hitherto a member unless he was previously holding any office of the Club either at the National or at the branch level or with not less than the sum of ₦500.00 (five hundred naira) if he is installed after the coming into operation of these bye laws.
  - (iv) He shall not present himself for any elective office of the Club except those of Patrons and Trustees.
- ### (b) Special Privileges of Registered Natural Rulers:-
- (i) They will be given special reserved seats at all engagements of the People's Club of Nigeria whether on national or branch level.
  - (ii) Special provision for them will not include the members of their entourage who can be settled at any available space.
  - (iii) The Registered Natural Rulers will not be served food in the public.
  - (iv) They are not required to stand up when Patrons enter the gathering.

(u) Their arrival at the Club's engagements may be announced but members will not be required to stand up while they enter as in the case of Patrons.

(vi) They may on their application to their respective branches be exempted from attending their regular or monthly meetings but they are required as other members to attend funeral ceremonies and other Social engagements of the Club.

(c) **Coronation of Natural Rulers who are members of People's Club of Nigeria:**

A natural ruler who is a financial member of one of the branches of the club may invite the People's Club of Nigeria by delivering a written invitation to the National Secretary at least one month before the date of coronation. On receipt of such invitation, the General Secretary shall send out circular letter to all branches informing them of the invitation and the date of the coronation. The National body shall attend the coronation. Attendance to an invitation of a natural ruler who is a member celebrating his annual Ofala is not compulsory for the National body nor will any purse be presented by the National body.

**AMENDMENT:**

These bye laws may be amended by the National Executive Committee by a simple majority of members present at the meeting.

**CONFLICT:**

Whenever there is a conflict between these bye laws and the Constitution, the latter shall prevail.

**STANDING ORDERS**

I. **Procedure for Induction Ceremony:**

(i) Before the induction ceremony starts, all old members and those to be admitted and all guests should remain seated.

(ii) The National Officers, Trustees, Patrons and Natural Rulers should walk in a solemn procession to the Table prepared for them.

(iii) All the rest of members and invitees will remain standing until the National Officers etc have walked in and taken seats.

(iv) A popular tune of the People's Club, as may be designed, shall be sung by every one after which all the members will then sit down.

(v) The National Secretary shall introduce the National Officers, Trustees, Patrons and Natural Rulers present at the occasion.

(vi) At branch induction ceremonies the Chairman of the branch shall lead the procession in case of existing branch, but the procession shall be led by the National President in the case of a new branch induction ceremony.

(vii) The order of Procession or sitting at all engagements of the Club shall be: --

(a) [1] National President and Vice Presidents

[2] The Registered Trustees

[3] The Patrons

[4] The National Legal Adviser

[5] The National Secretary

[6] Other National Officers in the order stated in the Constitution.

(7) Members of National Executive Committee.

(8) Other Natural Rulers.

(b) The wives shall accompany their husbands. It shall be the responsibility of Protocol Officers to ensure that the order is strictly maintained.

(c) A person holding two offices or more shall be given a position which is higher or the highest in the order of protocol.

iii) **Speeches:** The branch Chairman or in the case of new branches, the President will present a short address in the form of opening speech (not on the induction ceremony). All formal speeches will be completed before entertainment.

ix) With the exception of the members of the National Executive Committee and the branches' committees who will take precedence over all other members at the National and branch levels respectively, seniority and precedence in the People's Club of Nigeria shall be based on the date of induction of the individual into the Club.

**Induction Ceremony:**

i) Reading of the Aims and Objects of the Club by the National Legal Adviser (*In case of New Branches Induction Ceremony or by the branch Legal Adviser in case of Old Branch induction ceremony*). Where there is no Legal Adviser or he is absent, the National Secretary or the Secretary of the Branch respectively will do the reading.

ii) **Questions to be put to new members:**

(a) Do you believe in the aims and objects of the Club. - Yes

(b) Will you abide by the rules and regulations of the People's Club of Nigeria. - Yes.

(c) Do you wish to be admitted as a member of People's Club of Nigeria. - Yes.

iii) **Solemn Declaration by New Members with right hand raised up and palm facing the Chairman:** The wife should place

her right hand with palm stretched on the right shoulder of the husband. The following words shall be repeated by the New members after the Legal Adviser or other officer as the case may be:

"I ..... who am today the ..... day of 19..... admitted as a member of People's Club of Nigeria do hereby solemnly declare and affirm that as long as I remain a member of People's Club of Nigeria, I shall abide by its constitution, rules and regulations. So help me God".

(iv) **Admission Ceremony:** The National President or the branch Chairman while shaking the new member says: -

"Chief, Mr/Mrs ..... I confer on you the membership of People's Club of Nigeria and present to you your Membership Certificate. I wish you good health, long life and prosperity".

(v) **Toast of New Members:** To be proposed by a nominated member, after which, the old members will drink the toast of the new members who will remain seated.

(vi) Other speeches as may be allowed by the National President or branch Chairman.

(vii) Entertainment.

### 3. FUNERAL CEREMONY:

(i) Every member, on arrival, shall pay the last homage to the deceased by bowing before the corpse.

(ii) Speeches may be made as may be directed by the President.

(iii) Before interment, as many of the members as can be accommodated, will put the corpse into the coffin. Funeral oration may be delivered by the President or branch Chairman at the grave side.

(iv) Entertainment will be supervised by the National Welfare Committee.

on the issue will not be possible, he may on his own motion or on the motion of a member duly seconded, suspend discussion on the issue till a later time either at the same meeting or at a subsequent meeting.

(ii) Motions, amendments and counter motions must be duly moved and seconded before being voted upon. No motion shall be moved unless the Chairman invites motions on a topic provided that if the Chairman does not intend to call for motions, a member shall call for motions on the issue.

(iii) The Chairman shall not permit a member who in the opinion of the House appears to be drunk or engages in a disorderly behaviour to remain at any meeting. If the person refuses to leave the meeting when ordered by the Chairman and supported by a simple majority of members present, he shall be requested to leave the meeting and if he fails to comply he shall be forcibly sent out of the meeting and his case looked into at the next meeting of the National Executive. If found guilty of disorderly behaviour at the meeting, the executive shall, having regard to his conduct previously and at the trial, decide whether to warn and/or discharge, fine, suspend for a definite period, expel him or take any other action as the executive may in its absolute discretion deem fit and proper.

#### CONTRIBUTIONS, LEVIES & COLLECTIONS:

(i) New Members' fees (a) ₦1,000.00 — to the branch.  
(b) ₦ 250.00 — to the National  
for registration  
with the National  
Secretariat.

Funeral Contributions: ₦5.00 — per full member on the  
death of a member or  
his wife.

(ii) Financial gift to next of kin of deceased member or his wife —  
₦10,000.00

#### (b) Installation of Patrons:-

(a) ₦4,000 to his branch  
(b) ₦6,000 to National  
Total ₦10,000

(c) Cost of ceremony to be borne by him unassisted.

(e) Payment by branches seeking establishment to cover expenses of travelling National Officers and Executives: ₦6,000.00.

(vi) Levies: amount to be decided by National Executive as need arises.

(vii) Penalty payable by branches for late payment of levies, collections or dues.

All collections are made on branch basis and any branch that fails to pay the required amount within the stipulated time shall be liable to a penalty of 10% surcharge.

(viii) Donation by National Body on coronation of a Natural Ruler ... .. ₦2,000.00.

#### REGULATIONS 5:

##### Honours Register & Photographs:

(a) Qualification for People's Club of Nigeria, National Honours Award:

(i) He must have been a founding member of one of the four founding branches of the Club namely, Aba, Enugu, Lagos and Onitsha and must have been continuously a financial and an active member of his branch and the Club as a whole OR

(ii) He must have been a member of the Club for a minimum period of ten years and must have been a continuous financial and active member of his branch and the Club as a whole during the period.

# PEOPLES CLUB OF NIGERIA

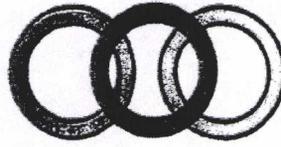
## BANKERS:

First Bank of Nigeria Plc.  
Union Bank of Nigeria Plc.

(REGISTERED IN NIGERIA) NATIONAL/INTERNATIONAL HEAD QUARTERS:  
REG. NO. 1295

Onitsha / Owerri Road,  
P.O. Box 5421,  
Onitsha, Anambra State.  
Tel: 046-322196

E-Mail Address: peoplesclubofnigeria@yahoo.com  
Website: www.peoplesclubofnigeria.com



Motto: UNITY, LOVE & SERVICE

Our Ref: .....  
Your Ref: .....  
Date Ref: ..... September 25, 2012

## NATIONAL / INTERNATIONAL OFFICERS

**President**  
Chief F.A. Onwuachu

**Vice President**  
Hon. R. O.C. Ekedozie

**Secretary General**  
Ichie P.C. Okechukwu

**Asst. Secretary General**  
Alhaji A.N. Obinwa

**Legal Adviser**  
Chief A.E. Enumah

**Fin. Secretary**  
Chief Shed Ekwegh

**Treasurer**  
Chief Dr. J.I. Ilonze

**Publicity Secretary**  
Chief K. Nwagba

**Protocol Officer**  
Chief Alvan Okoye

**SSS/WELFARE OFFICER**  
Chief L.C. Major

**House master**  
Chief P.A. Anu

Professor Gordian Ndubizu, Patron  
5 Milton Court  
Princeton JCT, NJ 08550

Dear Patron Ndubizu,

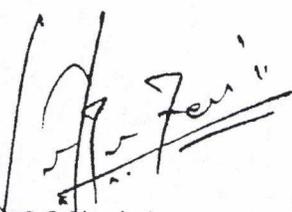
With reference to a unanimous action by the Executive Committee of the People's Club of Nigeria International, it is my duty and honour to inform you that you have been appointed the *Permanent Agent* of the People's Club of Nigeria International incorporated in the State of New Jersey, USA (incorporation # 010101702). Pursuit to this mandate and our discussions, your role and responsibilities take effect immediately and replaces the temporary position held by Dr. Iddi Mgbako.

Dr. Iddi Mgbako has been notified and asked to send you all relevant documents in his holding, including certificate of incorporation, tax identification number, bank account, and others.

Given your background as professor of accounting, we are excited on your appointment. Our club would surely benefit from your skills, expertise and experiences. Thank you and May God Bless you.

Sincerely,

  
Chief F.A. Onwuachu  
Acharugo, Osuofia Akokwa, Ogbuagu  
Adazi-ani, Ochiagha Okegbu  
President  
Peoples Club of Nigeria HQtrs  
Onitsha.

  
Ichie P.C. Okechukwu  
Ichie Ebeke Abatete  
Secretary General  
Peoples Club of Nigeria HQtrs  
Onitsha.



Petitioners 0258



STATE OF NEW JERSEY  
 DEPARTMENT OF THE TREASURY  
 DIVISION OF REVENUE AND ENTERPRISE SERVICES  
 PO Box 302  
 Trenton NJ 08646-0302  
 (609) 292-9292  
 www.nj.gov/njbgs



May 05, 2015

**ANNUAL REPORT**

125-044129  
 PEOPLE'S CLUB OF NIGERIA INTERNATIONAL, INC.  
 DR. GORDIAN NDUBIZU  
 5 MILTON CT, PRINCETON JCT  
 PRINCETON JCT NJ 08550

Dear Business Representative:

The Division of Revenue and Enterprise Services, Business Support Services Bureau has phased out the use of pap annual reports and moved all filers to electronic filing and payment on the New Jersey Business Gateway Registry Services. The annual report, which is a statutorily mandated filing contains vital public information and is required to be filed annually. If you have any questions on filing your Annual Report, please contact us at (609)292-9292.

Your business entity is required to use the electronic format to file and pay your annual report. This filing is due on or before 08/31/15. Payment may be made by electronic check, depository account or credit card.

- To file the annual report online, simply go to our website, [www.nj.gov/njbgs](http://www.nj.gov/njbgs), look for the heading "I want to" and choose the "File Annual Reports" option.

To log in, you will need the following three items:

NJ 10-digit ID number: 0101-0107-02  
 Type of Entity: NP  
 Formation/Authorization Date: 08/2010

**Important Notice:**

New Jersey Statute N.J.S.A. 34:15-79.1 requires the Division of Revenue and Enterprise Services to obtain certain information pertaining to the entity's worker's compensation coverage, if applicable. This information includes the company name, policy number, and coverage dates and is required with the submission of the annual report. Please have your information available prior to accessing the Annual Report application. The Division of Revenue and Enterprise Services will forward this information to the Department of Labor and Workforce Development. The Division of Revenue and Enterprise Services will not be the legal custodian of this information and it will not be available to the public as part of any business entity record request.

The New Jersey Division of Revenue and Enterprise Services has launched a new service, "CorpWatch" to allow subscribers to monitor Public Records filings made on New Jersey business entities. Once a subscriber signs up for the service, they will receive a notification text and/or email when Public Record changes are recorded by the State. Access to the service is at <http://www.nj.gov/treasury/revenue> or by visiting directly at <https://www.njportal.com/cor>. If you have any questions on this service please call (609)586-2600 during business hours.

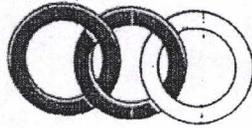
Sincerely,

Commercial Information Services Bureau

# PEOPLES CLUB OF NIGERIA

(REGISTERED IN NIGERIA)  
Reg. No. 1295

NATIONAL HEADQUARTERS:  
Onitsha Owerri Road  
P.O. Box 5421  
Onitsha, Anambra State  
Tel 046-270717 214987  
271412



Motto: UNITY, LOVE & SERVICE

**BANKERS:**

First Bank of Nigeria Plc.  
Union Bank of Nigeria Plc.

Our Ref: .....

Your Ref: .....

Date: .....

**NATIONAL  
MANAGEMENT  
COMMITTEE  
OFFICERS**

Chairman  
Chief F. A. Oduwole

Vice Chairman  
Chief G. U. Nwakafor

Secretary  
Chief P. C. Okechukwu

Asst. Sec.  
Alahaji A. N. Oduwa

Legal Adviser  
Chief C. I. Oduwole

Gen. Secretary  
Chief S. E. Ekwu

Treasurer  
Engr. I. A. Oduwole

Publicity Secretary  
Chief K. E. Oduwole

Protocol Officer  
Chief I. A. Oduwole

SSS Welfare Officer  
Chief I. A. Oduwole

31<sup>ST</sup> OCTOBER, 2006

THE CHAIRMAN  
PEOPLES CLUB OF NIGERIA INTERNATIONAL  
CHICAGO BRANCH (PROPOSED)  
UNITED STATES OF AMERICA.

Dear Sir,

**APPROVAL TO INAUGURATE A BRANCH OF  
PEOPLES CLUB OF NIGERIA INTERNATIONAL**

The Central Executive Council during her meeting held on the 27<sup>th</sup> of October 2006, had lifted embargo on establishment of new branches and thus approved your application for inauguration and induction of new members into your proposed branch.

Please note, the financial involvement as approved by the Governing Council and ratified by the Central Executive Council.

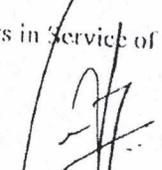
1. NEW BRANCH FEE	<u>OVERSEAS</u> \$ 10,000	<u>NIGERIA</u> Equivalent in exchange rate.
2. MEMBERSHIP FEE (PER MEMBER)	\$ 250	₦ 32,500
3. DEVELOPMENT FEE (PER MEMBER)	\$ 250	₦ 32,500
4. SOCIAL SECURITY SCHEME	\$ 31	₦ 4,000

Also approved is new death benefit payable to deceased member next of kin is ₦ 100,000=

The death benefit and SSS payment takes effect from 1<sup>st</sup> of January, 2007 while others take effect from 1<sup>st</sup> of April, 2007.

Please be guided accordingly while you make necessary arrangements for your Chartering and induction of new members in 2007.

Yours in Service of the Club.

  
**ICHIE P.C. OKECHUKWU**  
(EBEKE - ABATETE)  
SECRETARY

PEOPLES CLUB OF NIGERIA INTERNATIONAL HEADQUARTERS  
ONITSHA NIGERIA.

CC: The Chairman  
Boston Branch



**TRUSTEES:**

Prince I. I. Ezeoke, HRH Igwe P.C. Ezenwa, Sir Dr. J.O. Nwankwu, HRH Eze Des Oduwole, Chief Dr. C. N. Oduwole, Barister I. I. Ekwerekwu, Chief Dr. A. E. Ilodibe, Chief Sir J. O. Igwe

PEOPLES CLUB OF NIGERIA

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

Mr Chairman, Mr Iheanyi 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.

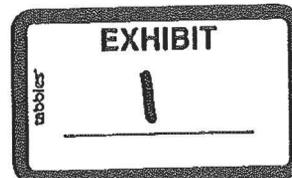
✓ The purpose of the visit of this delegation is to regularise the establishment and the granting of the Charter to the Houston branch of the Peoples Club. Secondly, to issue certificates to the members who were inducted last year.

✓ At this point, I must express my appreciation for the performance of Chief F F B O Nwankwo, Chief C. A. Chukelu, Chief Okonkwo Mangrover, Chief (Mrs) Voro Onyia and Chief Yin 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: Aba, Abakaliki, Abuja, Asaba, Adka, Bauchi, Benin, Calabar, Enugu, Edo, Jos, Kaduna, Kano, Lagos, Maiduguri, Makurdi, Knewi, Onitsha, Orlu, Owerri, Port-Harcourt and Warri.

(Stamps) 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,

Answer no 14<sup>2</sup>

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 Ihoanyi 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.

Ansari <sup>3</sup> NW 14

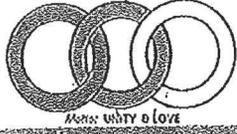
600032

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 I Obioha  
(Akaji-Ugo -- Arondizuogu)  
Ononaku of Orlu  
Ugo-Ihodi-Okeada 1 of Aba  
Aka-na-omoghe Obodo of Oru, Abiara  
Ogwure of Iguru, Mbaise  
Ozurugbo of Ihi-to-Oha, Uratta, Owerri  
(National President of the  
Peoples Club of Nigeria)



# 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 Joseph Nworuka blazed a new trail in the manufacturing sector by exporting his company's finished product to a Third World Market.

Chief Nworuka's Roadmaster Industries Limited based in Onitsha, manufactured and exported wheelbarrow tyres to Japan. What dumfounded Nigerians and the world at large was that Japan, regarded as saturated in every manufacturable equipment, was ready to accept wheelbarrow 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 stalling disquietingly 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 wheelbarrow 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 Roadmaster 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.

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 Onitsha 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. Obioha, (Akajigbo - Arondizuogu) charged them to be prepared to serve humanity and the nation.

Chief Obioha 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

is free to choose any religion or hold any political belief", he said.



Chief Dr. C.N. Obioha

The President added that one must glide 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 communiqué 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 12 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 1988.

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

benefits whittative.

It also decided in principle, on setting up craft/trade centres, Details, according to the communiqué, 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 communiqué 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 to 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 communiqué 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



At R.H. Eye C.M. Nwankwani (2nd) from left were members of the Peoples Club of Nigeria at the 5th Induction Ceremony. Secretary on back page.

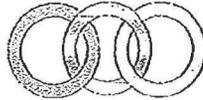
Answer No 14





# PEOPLES CLUB OF NIGERIA/INTERNATIONAL

CAC/IT/No. 1295  
Registered in Nigeria.



US Serial No. 86116372  
Registered in United States.

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

**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

**MOTTO: UNITY, LOVE & SERVICE**

**Our Ref:**

**Your Ref:**

**Date:** 25/10/2014

**MANAGEMENT COMMITTEE**

- President  
CHEF SIR J. I. IONZE
- 1st Vice President  
CHEF ONYEKACHO. OKORO
- 2nd Vice President  
CHEF R. O. C. EKEDOOZE
- 3rd Vice President  
CHEF SAM INYIGWE
- National Secretary  
ELDER SUART O. EBERE
- 1st Assistant National Sec.  
CHEF C. C. HOJIKWU
- 2nd Assistant National Sec.  
LADY DORIS ANIADOR
- Financial Secretary  
CHEF PAULKUS OHTENUFORO
- National Treasurer  
CHEF SIR DR. A. E. OKEKE
- Legal Adviser  
CHEF F. O. ONYEBUEKE
- Assistant Legal Adviser  
ANTHONY OFI EGBUSI (KSP)
- 2nd Assistant Legal Adviser  
BAR. OKAY AYOJA
- Publicity Secretary  
CAPT. J. O. NY. ONYEMA
- Assistant Publicity Sec.  
PROF. ELLIA OFARA
- Protocol Officer  
CHEF ALVAN OKOYE
- Assistant Protocol Officer  
HON. BONIBEKWE
- Welfare Officer  
CHEF GODDY ORANEDO
- Assistant Welfare Officer  
LADY RUBY INADI
- 2nd Assistant Welfare Officer  
IZIE BONIKWURGWU
- 3rd Assistant Welfare Officer  
BRO. GODWIN ADELE
- 4th Assistant Welfare  
CHEF S. O. IGBOABAEZE
- House Master  
CHEF MARTIN EZEKWE
- Assistant House Master  
CHEF ERNEST O. UGORJI
- 2nd Assistant House Master  
HON. VICTOR INEZE
- 3rd Assistant House Master  
HON. ANANE OKENE

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. Ionze  
President PCNI

Hon. Elder Smart O. Ebere  
National Secretary PCNI

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

11 01 010 110

INTERROGATORY NO. 6

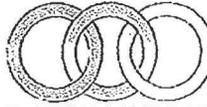
**EXHIBIT**  
4

# 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 Oyejide O. Oloro
- 2nd Vice President  
Chief R. O. C. Eleduwa
- 3rd Vice President  
Chief Sam Ilajana
- National Secretary  
Chief S. O. Eboke
- 1st Assistant National Sec.  
Chief C. C. Iloje
- 2nd Assistant National Sec.  
Lady D. A. Ayedun
- Financial Secretary  
Chief P. A. Oyejide
- Legal Adviser  
Chief F. O. Oyejide
- Assistant Legal Adviser  
Chief O. A. Ayedun
- Publicity Secretary  
Chief J. O. W. Oyejide
- Assistant Publicity Sec.  
Chief E. O. Oyejide
- Protocol Officer  
Chief A. O. Oyejide
- Assistant Protocol Officer  
Chief B. O. Oyejide
- Welfare Officer  
Chief L. O. Oyejide
- Assistant Welfare Officer  
Chief G. O. Oyejide
- 2nd Assistant Welfare Officer  
Chief R. O. Oyejide
- 3rd Assistant Welfare Officer  
Chief S. O. Oyejide
- House Master  
Chief H. O. Oyejide
- Assistant House Master  
Chief E. O. Oyejide
- 2nd Assistant House Master  
Chief V. O. Oyejide
- 3rd Assistant House Master  
Chief A. O. Oyejide

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 Eberé  
General Secretary**

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



000001

February 18, 2015

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

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 disassociates 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, Schillel 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



000013

1

## E R R A T A

2

3

PAGE LINE CHANGE

4

11

~~16~~ 17

Line in New Jersey since 1975

5

12

3

New Jersey 07402

6

23

8

Delete <sup>#</sup> President and substitute Chair

7

~~25~~ ~~23~~ ~~24~~

1

Change Presenting to President In

8

25

2

Change Presenting to President In

9

25

3

Change which is to with his

10

25

8

Annual General Meeting

11

25

9

Delete 'is a member of all'

12

26

2

CEB to CEC

13

26

11

Presenting to President In

14

50

7

Committee to Constitution

15

58

17

change to "you are supposed not to..."?

16

58

25

you don't operate as a branch of the

17

60

7

change proffers to REASON

18

67

7

SEG to LCG

19

67

8

SEG to LCG

20

93

16

2013 to 2015

21

22

23

24

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

ACKNOWLEDGMENT OF DEPONENT

I, AMBROSE MGBAKO MD do

hereby certify that I have read the foregoing pages, 1 - PGS, and that the same is a correct transcription of the answers given by me to the questions therein propounded, except for the corrections or changes in form or substance, if any, noted in the attached Errata Sheet

Ambrose  
WITNESS NAME

1/12/16.  
DATE

Subscribed and sworn

to before me this 12<sup>th</sup> day of January, 2016.

My commission expires: Jan 23, 2018

Rosemarie D. Rosales

Notary Public



Rosemarie D. Rosales  
ROSEMARIE D ROSALES  
ID # 2209048  
NOTARY PUBLIC  
STATE OF NEW JERSEY  
My Commission Expires Jan. 23, 2018