

**UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE DIRECTOR**

In re:)
)
Stelcore Management Services, LLC,)
Stelcore Management Services Pvt., Ltd.)
[REDACTED])
)
)
Respondents)
_____)

This Order is Citable as Precedent

FINAL ORDER FOR SANCTIONS

In an order dated May 5, 2025 (the “Show Cause Order”), the United States Patent and Trademark Office (“USPTO” or “Office”) required [REDACTED], Stelcore Management Services LLC and Stelcore Management Services Pvt., Ltd. (also known as Stelcore Group), and their officers, employees, and/or agents (collectively, “Respondents”) to show cause as to why the USPTO should not immediately issue sanctions pursuant to 37 C.F.R. § 11.18(c) based on Respondents’ violation of the Rules of Practice in Trademark Cases (“USPTO Rules”) and the Terms of Use for USPTO Websites, including the Trademark Verified USPTO.gov Account Agreement. See *generally* 15 U.S.C. §§ 1051 *et seq.*; 37 C.F.R. Parts 2, 11; <https://www.uspto.gov/terms-use-uspto-websites>; <https://www.uspto.gov/sites/default/files/documents/TM-verified-account-agreement.pdf>.¹

The Show Cause Order was sent to the Respondents’ email addresses, courtesy notifications were issued to applicants’ correspondence addresses of record, and copies of the order were uploaded into the application records identified in the Show Cause Order.² The notices explained the process by which the owners of the identified applications could request removal from the administrative show cause proceedings. A response to the order was due by 11:59 PM on June 5, 2025. The USPTO received a timely response from Respondents on June 4, 2025.

As a brief overview, Respondents, in their June 4, 2025 response admit that they violated the USPTO Rules, Terms of Use, and USPTO.gov Account Agreement. Specifically, Respondents admit that they prepared or prosecuted U.S. trademark applications and other submissions on behalf of others although they are not licensed U.S. attorneys, and entered the signature of another person, namely a U.S.-licensed attorney. The response fails to demonstrate that any of the submissions in the proceedings identified in Exhibit A were properly signed or submitted. See *infra* II(A)-(B). Finally, Respondents explicitly

¹ Links to orders issued under the authority of the Commissioner for Trademarks are available at <https://www.uspto.gov/trademarks/protect/decisions-and-proceedings-search-tool>

² A list of the U.S. Trademark Applications directly affected by this order is attached hereto as Exhibit A.

request that the pending trademark applications be “canceled without prejudice,” and that applicants be permitted to file new applications.

The request that the applications be “canceled without prejudice” is effectively granted through the imposition of the termination sanction proposed in the Show Cause Order and discussed below. Should the owners of the impacted applications wish to file new, properly executed applications, the termination of the current application proceedings does not prejudice their ability to do so. Each application constitutes a new application proceeding with its own application filing date. Additional sanctions are imposed based on the conduct discussed below.

I. Relevant Legal Requirements

All submissions to the USPTO in trademark matters are governed by U.S. trademark laws and the regulations governing practice in trademark matters before the Office, including the rules concerning signatures, certification, and representation of others (collectively, “USPTO Rules”). See *generally* 15 U.S.C. §§1051 *et seq.*; 37 C.F.R. Parts 2, 11. Protecting the integrity of the U.S. trademark register is of the utmost concern to the USPTO because the register is intended to reflect trademarks actually used in commerce; its accuracy serves the critical purpose of avoiding needless costs and burdens to applicants, who rely upon its contents when choosing a mark. See *Norton v. Curtiss*, 433 F.2d 779, 794 (CCPA 1970); see also *Look Cycle Int’l v. Kunshan Qiyue Outdoor Sports Goods Co., Ltd.*, Can. No. 92079409, 2024 TTAB LEXIS 289 (2024). Providing false information in a trademark submission to obtain or maintain a registration undermines the integrity of the examination process and the register, and those who provide false, fictitious, or fraudulent information are subject to sanctions. See *In re Yusha Zhang*, 2021 Commr. Pat. LEXIS 2 at *10, *23-24 (Dir. USPTO 2021).

A. Rules Governing Representation of Others

Only attorneys who are active members in good standing of the bar of the highest court of a U.S. state or jurisdiction may practice before the USPTO in trademark matters on behalf of others. 37 C.F.R. §§2.17(a), 11.1, 11.14(a); see also 5 U.S.C. §500(b). Foreign domiciled parties must be represented by a qualified U.S.-licensed attorney before the USPTO, and this rule has been a requirement in effect since August 3, 2019. 37 C.F.R. §2.11. Regardless of the applicant’s or registrant’s domicile, individuals who are not U.S.-licensed attorneys may not (1) give advice to an applicant or registrant in contemplation of filing a U.S. trademark application or application-related document; (2) prepare or prosecute any U.S. trademark application, response, or post-registration maintenance document; (3) sign amendments to applications, responses to Office actions, petitions to the Director, or request to change correspondence information; or (4) authorize any other amendments to an application or registration.³ See 37 C.F.R. §11.5(b)(3).

³ While there is a limited exception for Canadian agents or attorneys who have been granted reciprocal recognition to practice before the Office in trademark matters for Canadian filers, that exception does not apply here.

B. Rules Governing Signatures on Submissions

i. Generally

All signed documents must comply with Rule 2.193 and therefore must be *personally* signed by the named signatory, including the personal entry of all electronic signatures.⁴ See 37 C.F.R. §§2.193(a), (c), 11.18(a); Trademark Manual of Examining Procedure (“TMEP”) §611.01(b) (May 2025 ed.). A person may not delegate the authority to sign trademark-related submissions, and no party may sign the name of another. See *Zhang*, 2021 Commr. Pat. LEXIS 2 at *10; *In re Dermahose Inc.*, Ser. No. 76585901, 2007 TTAB LEXIS 25, at *9-10 (2007); *In re Cowan*, Reg. No. 1225389, 1990 Commr. Pat. LEXIS 24, at *5-6 (Comm’r Pats. 1990); see also TMEP §§611.01(b)-(c), 804.04. For example, a paralegal, legal assistant, or secretary may not sign or enter the name of an attorney or other authorized signatory. TMEP §611.01(b). A trademark submission that is signed by a person other than the named signatory, is improperly executed, and cannot be relied upon to support registration. See *Zhang*, 2021 Commr. Pat. LEXIS 2 at *10; *Ex parte Hipkins*, Appeal No. 90-2250, 1991 Pat. App. LEXIS 14, at *10-13 (BPAI 1991); *Cowan*, 1990 Commr. Pat. LEXIS 24, at *5-6. A signature that does not meet the “personally signed” or “personally entered” requirements, see 37 C.F.R. §§2.193(a), (f), 11.18(a), “may jeopardize the validity of [an] application or registration.” 37 C.F.R. §2.193(f). Thus, these signature requirements are not merely technical in nature but rather are substantive.⁵

The requirement for personally-entered signatures is not new. It has been in place for more than 20 years. 68 Fed. Reg. 48286, 48290 (2003). The TMEP has included a reference to the requirement since at least as early as 2005. TMEP §§302, 602.03 (4th ed., April 2005). And, since at least as early as 2012, the TMEP has included examples about what is not permissible under the “personally signed” requirement: “All documents must be personally signed Another person (e.g., paralegal, legal assistant, secretary) **may not sign** the name of an attorney or other authorized signatory.” TMEP §611.01(b) §611.01(b) (October 2012 ed.) (emphasis added).⁶

⁴ In the relevant time period, the trademark electronic system forms allowed for two ways to sign a document electronically: 1) the signatory directly enters the signature in the signature field on the electronic form (“Direct Signature”), 2) the signatory receives an emailed link to the form, which allows them to enter their electronic signature in the signature field (“ESIGN-ON”). The trademark electronic system forms now also allow for electronic signatures entered using document-signing software, however, this method was not used in any of the submissions referenced in this order. See TMEP §611.01(c)(ii).

⁵ In *Nallapati v. Justh Holdings, LLC*, No. 5:20-CV-47-D, 2023 U.S. Dist. LEXIS 39878, at *18 (E.D.N.C. Mar. 9, 2023), the court determined that an improperly entered signature was a “technical error.” The USPTO disagrees with that characterization, and it was not a party to that case. Moreover, importantly, even the court in *Nallapati* recognized that concerted efforts to abuse the USPTO’s rules and procedures are distinguishable from the facts of that case. *Id.* at *18.

⁶ Public presentations by the USPTO have emphasized the importance of personally entering signatures. See, e.g., <https://www.uspto.gov/learning-and-resources/uspto-videos/representation-signatures-and-ethical-issues-trademark-cases>. And numerous trademark attorneys have been publicly disciplined by the USPTO Director under the USPTO Rules of Professional Conduct for violating the USPTO trademark signature rules. See FOIA Documents at <https://foiadocuments.uspto.gov/oed/>.

ii. The ex parte process demands adherence to the rules

Trademark examination is an ex parte process in which determinations, such as whether the requirements for registration or the requirements for maintenance of a registration have been satisfied, are based on an applicant's or registrant's representations. The averments in trademark submissions provide facts material to registrability, including information about use of a mark in commerce or bona fide intention to use a mark in commerce, and, in the case of post-registration submissions, information relevant to the continued maintenance of a registration, all of which are statutorily prescribed. See 15 U.S.C. §§1051(a)(3), 1051(b)(3), 1058-1059. These averments, which are set out explicitly in many trademark electronic system forms, must be supported by a signed verification or declaration, as described in 15 U.S.C. §§1051(a)(3), 1051(b)(3), 1058-1059, signed by an individual authorized to verify these facts as set out in 37 C.F.R. §2.193(e)(1) (identifying attorneys and persons with legal authority to bind the owner or with firsthand knowledge of the facts, as authorized to verify).

The Office and the public necessarily rely upon the truth and accuracy of those averments and other representations. See *Norton* 433 F.2d at 794 (“With the seemingly ever-increasing number of applications before it, the [USPTO] . . . must rely on applicants for many of the facts upon which its decisions are based.”); see also *Zhang*, 2021 Commr. Pat. LEXIS 2 at *10, *26. Thus, “the highest standards of honesty” must be adhered to by parties presenting facts to the Office as the facts have so often been held essential in the proper functioning of the patent and trademark registration systems. See *Doctor Vinyl & Assocs. V. Repair-It Indust.*, 1983 TTAB LEXIS 43 (1983) (citing e.g., *Norton*, 433 F.2d at 779, 57 C.C.P.A. at 1384); see also 37 C.F.R. §11.303(d) (USPTO Rules of Professional Conduct’s duty of candor to tribunals, such as the USPTO, in ex parte proceedings).⁷ When the representations are inaccurate, they undermine the integrity of the Trademark Register.

With specific respect to signature requirements, the identity of the signatory determines the effect of a document. The USPTO relies on the filing party’s truthfulness in identifying the signatory to determine whether to accept submissions to further advance the examination of an application or registration. See 37 C.F.R. §§ 2.62(b), 2.74(b), 2.163(b); see also TMEP §§606, 611.01, 611.05 *et seq.*, 712, 718.01. If, for example, certain submissions are not signed by an individual who is authorized under the USPTO Rules

⁷ In the patent context, courts have long held that applicants and practitioners before the USPTO are in a relationship of confidence and trust to the agency and that the duty of candor to the USPTO is “uncompromising.” See *Norton*, 433 F.2d at 794; see also *Kansas Jack, Inc. v. Kuhn*, 719 F.2d 1144, 1151 (Fed. Cir. 1983); *GE v. Mitsubishi Heavy Indus.*, 946 F. Supp. 2d 582, 588 (N. Dist. Texas 2013). See also 37 C.F.R. Part 11, which includes rules of professional conduct which set forth the duties and standards of conduct incumbent upon registered practitioners (as defined in 37 C.F.R. § 11.1) before the USPTO. Such duties include competency, confidentiality, conflicts of interest, honesty toward third parties, and many others. 37 C.F.R. 11.101-11.804. A practitioner who presents a document to the USPTO is responsible for conducting an inquiry under the circumstances to support the certifications set forth in 37 C.F.R. § 11.18(b). Nothing in this order precludes the USPTO from an Office of Enrollment and Discipline investigation or enforcement under 37 C.F.R. § 11.101-804.

to sign, those submissions are given no effect and the Office will require a properly signed response in order to advance prosecution. TMEP §712.03. If, at that point, the Office does not receive a properly signed response, the application will be held abandoned for failure to file a complete response. *Id.* It necessarily harms the registration process when submissions are not personally signed by the named signatory. The Office is left without complete or accurate information as to whether the person who executed the document had the requisite knowledge necessary to attest to factual contentions, or whether the person was an authorized signatory.⁸ False signature information substantially prejudices the USPTO's ability to carry out its mandate to register only those marks for which the appropriate factual foundation supports registration.

iii. Correction or perfection is not available for all defective signatures

Under 35 U.S.C. §26, the Director has the discretion to permit correction of defectively executed documents. As applied to trademark filings, the principal factors to be considered are (1) the seriousness of the defect and (2) steps taken by the party to effectuate a proper execution. *In re Weider*, 1981 Commr. Pat. LEXIS 5, at *6 (Comm'r Pats 1981). Critically, only if the defect is minor, and the "surrounding circumstances establish that a party exercised reasonable care to effect a proper execution," could a document be accepted under 35 U.S.C. §26. *Weider*, 1981 Commr. Pat. LEXIS 5, at *6.⁹ In contrast, serious defects and those not borne out of an exercise of reasonable care are neither correctable nor able to be perfected. See *id.* at *5. (identifying non-correctable defects).¹⁰

⁸ Merely submitting a potentially corrective signature in the record does not insulate an application or registration from later being challenged based on the effects of the original improperly-entered signature and the certification of the information submitted, or from inclusion or reference in an administrative sanctions or disciplinary proceeding. See *Norton*, 433 F.2d at 794 ("While being a fact-finding as well as an adjudicatory agency, [the USPTO] is necessarily limited in the time permitted to ascertain the facts necessary to adjudge the . . . merits of each application. . . . Clearly, [the USPTO] must rely on applicants for many of the facts upon which its decisions are based. The highest standards of honesty and candor on the part of applicants in presenting such facts to the office . . .").

⁹ Examples from cases cited in *In re Weider* include *Carl Zeiss Stiftung v. JENAer Glaswerk Schott & Gen.*, 1974 Commr. Pat. LEXIS 2, *1 (Comr. Pats. 1974) (notary before whom verification of a Notice of Opposition under Section 13 of the Trademark Act was made was a notary of the German Democratic Republic and not an appropriate official to administer oaths in a foreign country, under the provisions of Section 11 of the Trademark Act); *Ex parte Louisville & Nashville R.R.*, 1971 Commr. Pat. LEXIS 1, *1 (Comr. Pats. 1971) (failure by notary to fill in the appropriate blanks in a jurat statement accompanying an affidavit under Section 8 of the Trademark Act); *Lucien Piccard Watch Corp. v. Countess da Vinci*, 1970 Commr. Pat. LEXIS 3, *1 (Comr. Pats. 1970) (failure of opposer to sign at the end of the verification of a Notice of Opposition under Section 13 of the Trademark Act, although the Notice of Opposition itself was signed and the notary took opposer's oath to the fact that allegations in the Notice of Opposition were true); *Ex parte The Buehler Corp.*, 1968 Commr. Pat. LEXIS 5, *1 (Comr. Pats. 1968) (failure to include all the necessary averments in a Notice of Opposition under Section 13 of the Trademark Act, although the notarial verification "subscribed and sworn to before me" was included).

¹⁰ See cases cited in *Weider*, e.g., *In re Laboratories Goupil, S.A.*, 1977 Commr. Pat. LEXIS 5, *1 (Comr. Pats. 1977) (failure to notarize or to include a Rule 2.20 declaration with a paper filed under Section 8 of the Trademark Act); *Tex. Instruments Inc. v. Conklin Instrument Corp.*, 1969 TTAB LEXIS 56, *740 (TTAB 1969) (failure to include any verification with a petition to cancel under Section 14 of the Trademark Act); *Schenley Industries, Inc. v. E. Martinoni, Co.*, 408 F.2d 1049 (C.C.P.A. 1969) (failure to provide any verification of a Notice of Opposition within the period prescribed by the Trademark Rules).

Likewise, although TMEP §712.03 provides a procedure for processing responses to Office actions signed by an improper party, there are limited circumstances in which the procedure applies. Importantly, this procedure depends on a signatory truthfully identifying themselves so that the Office may make a determination as to whether the identified signatory is a proper party to sign thereby allowing the Office to determine whether the facts presented in the submission can be relied upon. See 37 C.F.R. §§ 2.62(b), 2.74(b); TMEP §712.03 (identifying examples as where a foreign attorney or corporate employee signs). The procedure “to perfect the response” described in this section will not cure any defects in an original signature to avoid the imposition of sanctions by the USPTO if additional rule violations or Terms of Use violations are later discovered.

C. Rule 11.18 Certifications and Violations

Under USPTO Rules, any party who presents a trademark submission to the USPTO is certifying that “the paper is not being presented for any improper purpose” and “[t]he allegations and other factual contentions have evidentiary support.” 37 C.F.R. §11.18(b); *see also* 37 C.F.R. §2.193(f) (noting that presentation of any document to the USPTO constitutes certification under 37 C.F.R. §11.18(b)). By presenting a paper to the Office, a person is certifying, among other things, the veracity of the information contained therein, that a reasonable inquiry has been undertaken to ensure that the paper is not being presented for an improper purpose, and that any allegations and other factual contentions have evidentiary support. 37 C.F.R. §11.18(b)(1)-(2).

Submitting a document that includes false, misleading, fictitious, or fraudulent information or representations violates 37 C.F.R. §11.18(b)(1). This includes, for example, false or misleading domicile information, attorney information, signatory information (e.g., where the named signatory did not personally enter his or her signature on the document), applicant information, or claims of use (or intent to use). Submitting a document without undertaking a reasonable inquiry into the factual basis for the averments, without evidentiary support, in an effort to circumvent USPTO Rules, or coupled with other rule or Terms of Use violations constitutes an improper purpose and violates 37 C.F.R. §11.18(b)(2). *See also* 37 C.F.R. §2.11(e). Violations of 37 C.F.R. §11.18(b)(2) may result in sanctions under 37 C.F.R. §11.18(c); *see also* 37 C.F.R. §2.193(f); *Bang-er Shia*, Proceeding No. D2014-31, at *10-12 (USPTO Apr. 22, 2015) (Reconsideration Denied August 1, 2016); *Zhang*, 2021 Commr. Pat. LEXIS 2, at *10, *26. It may also result in referral of a practitioner’s conduct to the Director of the Office of Enrollment and Discipline for appropriate action. *See* 37 C.F.R. §11.18(c)(4).

D. Policies governing Use of USPTO.gov Systems

Any party who uses USPTO systems, including the USPTO.gov website and electronic filing systems, is bound by both the Terms of Use for USPTO websites and the USPTO Trademark Verified USPTO.gov Account Agreement.

Under the Terms of Use, registration for, and use of, a USPTO.gov account is limited to the individual to whom the account is registered, and the registered individual is responsible for all activities occurring under that account and any sponsored accounts. Use of a USPTO.gov account to submit, access, or alter information exceeding one's authority not only breaches the Terms of Use, but may also violate other USPTO Rules including but not limited to 37 C.F.R. §§2.193(f) and 11.18(b).

II. As conceded in their response, Respondents repeatedly violated USPTO Rules by engaging in the unauthorized practice of law and by providing false attorney and signature information, and did so by violating the Terms of Use

The Show Cause Order, which is incorporated by reference in this Final Order, sets out the evidence demonstrating Respondents' misconduct that forms the basis for imposing sanctions. Although they nominally dispute the USPTO's conclusions regarding their intent, Respondents' response confirms that they engaged in the unauthorized practice of law, violating signature rules and providing false, fictitious, or fraudulent information to conceal their misconduct. USPTO evidence indicates that Respondents' misconduct extended to misuse of the USPTO's electronic filing systems and USPTO.gov accounts. Respondents do not factually demonstrate otherwise.

Further, although Respondents assert that they did not act in bad faith or intend to violate USPTO Rules, their evidence and arguments do not support those assertions. Respondents' scheme to engage in the unauthorized practice of law, and their repeated misrepresentations during the ex parte examination process were designed to circumvent USPTO Rules and were thus submitted for an improper purpose. Respondents inflicted significant harm upon the trademark registration process, including but not limited to, undermining the integrity of the trademark register by preventing the USPTO from complying with its mandate to register only those marks that are statutorily entitled to registration.

A. Respondents engaged in the unauthorized practice of law before the USPTO and repeatedly provided false attorney and signature information in trademark submissions.

Evidence provided in the Show Cause Order establishes that Respondents violated the USPTO's rules governing representation and signatures to conceal their unauthorized practice of law, resulting in the examination of applications with non-correctable defects. *See generally* Show Cause Order.

Consistent with the USPTO's evidence and findings in the Show Cause Order, Respondents also acknowledge in their response that they are not U.S.-licensed attorneys, and admit giving advice to clients about applications and preparing and filing

trademark submissions, including applications and responses, on behalf of their clients.¹¹ In other words, Respondents admit that they engaged in the unauthorized practice of law. See 37 C.F.R. §§2.17, 11.5(b)(3) (identifying Respondents' activity as practice before the Office).

The Show Cause Order also set forth the USPTO's evidence supporting a finding that Respondents forged the signatures of applicants and a U.S.-licensed attorney on trademark submissions along with improperly entering his bar information, in furtherance of their unauthorized practice of law. Show Cause Order, pp. 8-9, Exhibits D, E, F. Consistent with the evidence in Exhibits E and F to the Show Cause Order, Respondents admit entering the signature of the U.S.-licensed attorney. Response, pp. 8-9 (e.g., "we take full responsibility for having signed the applications ourselves"). Although Respondents attempt to justify their conduct by asserting that the attorney was nonresponsive to their communications¹² or that they thought they had authorization to use his name and signature,¹³ Respondents' conduct was a clear violation of longstanding USPTO signature rules which require the signatory to personally sign or enter their signature into the submission. By entering the signature of the U.S.-licensed attorney identified as the signatory, Respondents provided false signatory information, false attorney information, and improperly signed the submission, all of which violates 37 C.F.R. §§ 2.11(a) and 2.193.

For applications and submissions that appear to bear the electronic signatures of applicants, Respondents assert that the applications were signed by applicants physically in their offices. Response, p. 6. However, they provide no evidence to support this assertion, nor do they address the evidence presented by the USPTO. *Id.* Indeed, assuming *arguendo* that Respondents' assertion is accurate and truthful, together with the USPTO's evidence, that would mean that geographically dispersed applicants from locations including the Canary Islands and geographically distant regions in India, traveled multiple times to New Delhi and other cities to personally enter their signatures. Show Cause Order Exhibit D. Or, that the signatory identified for U.S. Trademark Application Serial Numbers 88302613, 88584776, and 88023953, would have traveled to

¹¹ Respondents assert that they were eligible to represent others prior to the implementation of the U.S. Counsel Rule in August 2019 and go as far as to claim that they had a "right" to engage in such actions. The USPTO Rules have never permitted non-attorneys to practice before the USPTO on behalf of others in trademarks matters. See *generally* 37 C.F.R. Parts 2, 11.

¹² Respondents' arguments also include allegations related to this attorney's ethical and professional duties. The USPTO declines to take a position on these statements. Concerns related to professional or ethical obligations should be raised directly with the USPTO's Office of Enrollment and Discipline, which operates independently from the USPTO's Office of the Commissioner for Trademarks. See *generally* 37 C.F.R. Parts 2 and 11.

¹³ As evidence, Respondents provide Annexures 1-10, of which the majority are incomplete excerpts of email threads or other documents. Compare, e.g., page 2 of Annexure 1 showing an email that was sent on August 14, 2019 at 10:54PM with the subject line "Re: Alliance Opportunity," with page 1 of Annexure 6, in which the identical email is missing the subject line and related email messages preceding and subsequent to this portion of the email thread. The incomplete nature of these submissions necessarily impacts the probative value they can be afforded. In any event, for the reasons discussed above, they do not establish that Respondents' activity was free of violations of USPTO Rules.

entirely different areas of India to review and sign submissions. Show Cause Order Exhibit D. U.S. Trademark Application Serial Number 88023953, for example, would have involved the applicant traveling from Mumbai to Chennai, Delhi, Jaipur, and eventually Bengaluru to directly sign submissions according to Respondents' allegations. *Id.* Further, in at least 10 records, the IP address associated with the application filing was identical despite the geographic diversity of the applicants and the purported signatories.¹⁴ These assertions regarding applicants' physical presence in Respondents' offices are not credible, and are unsupported by documentary evidence that corroborate them. Thus, Respondents have not demonstrated that the applicant signatures on applications filed from their computer networks and using their USPTO.gov accounts were properly or personally entered. Respondents also did not present any evidence demonstrating that applicants conducted the requisite reasonable inquiry into the factual assertions made in the application. Response, p. 6. The totality of the evidence establishes that Respondents' conduct with respect to the applications, entering the signatures of applicants on application forms and providing false signatory information, violated 37 C.F.R. §§2.193, 11.18(b).

Respondents assert a lack of intent or bad faith in their actions. Although intent is not determinative of the rule violations, rather than demonstrate an absence of bad faith, the Response confirms that Respondents knowingly and falsely identified the signatories in these application files as a U.S.-licensed attorney. Nor does the Response sufficiently address the USPTO's evidence demonstrating that they likewise knowingly and falsely identified applicants as the signatories in application files. Further, Respondents forged the signature of the U.S.-licensed attorney with full knowledge of the representation requirements. The annexures to their Response, although incomplete, demonstrate their awareness that the trademark application was a legal proceeding and their foreign-domiciled clients must be represented by U.S. counsel. Response, Annexures 1, 6 (falsely representing that they had a team of lawyers); see *also* Show Cause Order Exhibit G.

B. There are significant defects in the signatures in the identified trademark proceedings.

Respondents repeatedly forged the signatures of the individuals identified as signatories on declarations supporting averments and responses, to include the signature of U.S.-licensed attorney [REDACTED]. Respondents presented no evidence demonstrating that the individuals, whether applicants or the named U.S.-licensed attorney, identified as the signatories, verified the factual allegations in the submissions. Rather, Respondents acknowledge that the attorney did not review the applications they filed with his forged signature. Response, p.9. Because the evidence supports a finding that the averments in the relevant applications are supported by forged applicant or attorney signatures, they cannot be relied upon to determine registrability. See, e.g., *Hipkins*, 1991 Pat. App. LEXIS 14, at *10-13; *Cowan*, 1990 Commr. Pat. LEXIS 24, at *5-6.

¹⁴ The files are Serial Nos. 88060533, 88302613, 88418333, 88489304, 88493128, 88553670, 88584776, 88616980, 88616981, and 88823539.

In addition, Respondents' forgery of attorney signatures on responses to Office actions misrepresented the identity of the signatory, causing the USPTO to treat the responses as signed by an authorized signatory, although they were not. See TMEP §§601, 611, 712. For many of the applications in which Respondents forged [REDACTED]'s signature, the applicants identified as foreign-domiciled, thus requiring representation by a qualified U.S. attorney. 37 C.F.R. §2.11(a). And, as a result, only a response signed by a U.S.-licensed attorney would be deemed properly signed and acceptable. See 37 C.F.R. §§ 2.62(b), 2.74(b), 2.163(b); *see also* TMEP §§606, 611.01, 611.05 *et seq.*, 712, 718.01. If Respondents had not misrepresented the identity of the signatory and the Office was aware that the responses were not properly signed by an authorized signatory, these responses would have been treated as incomplete and not accepted. TMEP §712.03. Further, in this context, unless a properly signed response was submitted to the Office, the application would be held abandoned for failure to file a complete response. *Id.* As such, not only did Respondents' forgery advance prosecution where it was not merited, but also avoided abandonment of the application, all under false pretenses. *Id.* Moreover, the forgery concealed Respondents' unauthorized practice of law.

Thus, the evidence available to the USPTO indicates that there are significant defects in the signatures in the identified applications. They were not entered by the named signatory in violation of 37 C.F.R. §2.193. The evidence also indicates that Respondents did not take reasonable care to effectuate a proper execution of applications and responses to Office actions. See *Weider*, 1981 Commr. Pat. LEXIS 5, at *6. Rather, with full knowledge that truthfully identifying the signatory as Respondents' employees would not satisfy the representation requirements, Respondents entered the signatures of a U.S.-licensed attorney or the applicant to falsely comply with USPTO Rules and advance prosecution where not merited. Further, Respondents forged applicant and attorney signatures to conceal their unauthorized practice of law. Although Respondents request to correct the signatures, correction is not available. The defects in these signatures are more than mere technical errors and cannot be corrected or perfected under 35 U.S.C. §26.

C. Respondents submitted trademark documents for an improper purpose in violation of Rule 11.18(b).

Respondents' pattern of repeatedly submitting false or deceptive information in violation of USPTO Rules highlights their disregard for USPTO Rules and the certifications they signed. In each of the trademark application proceedings listed in Exhibit A, Respondents repeatedly provided false information regarding the identities of the signatories and attorney of record and forged their signatures, resulting in violations of 37 C.F.R. §§2.11, 2.193(a). Respondents' provision of false information and rule violations concealed their unauthorized practice of law and related violations of 37 C.F.R. §§2.17, 11.5(b)(3) to deceive the USPTO as to the propriety of the filings and induce the USPTO to examine them. See, e.g., *In re Bose Corp.*, 580 F.3d 1240, 1243, (Fed. Cir. 2009) ("Fraud in procuring a trademark registration or renewal occurs when an applicant knowingly makes false, material representations of fact in connection with his application."); *Chutter, Inc. v. Great Mgmt. Grp., LLC*, 2021 TTAB LEXIS 365, *27 (TTAB 2021), (holding that "willful"

includes reckless behavior and “as a matter of law that reckless disregard satisfies the requisite intent for fraud on the USPTO in trademark matters”), *rev’d on other grounds*, 90 F.4th 1333 (Fed. Cir. 2023) at *25; *Fuji Med. Instruments Mfg. Co., Ltd. v. Am. Crocodile Int’l Grp., Inc.*, 2021 TTAB LEXIS 270 (TTAB 2021).

Respondents knowingly and repeatedly misrepresented material information such as the attorney or signatory’s involvement in prosecution to deceive the USPTO as to the propriety of the filings. As such, Respondents’ conduct described in the Show Cause Order and above warrants a finding that Respondents submitted documents for an improper purpose because they violated USPTO Rules in order to circumvent the USPTO rules regarding representation. See *Zhang*, 2021 Commr. Pat. LEXIS 2, **8-10; 37 C.F.R. §§, 2.11(e), 11.18(b)(2).

In addition, the totality of the evidence indicates that Respondents used USPTO.gov accounts within their control to repeatedly submit documents for an improper purpose, specifically for the purpose of violating 37 C.F.R. §§2.193(a) and 11.18 as discussed above.

D. Respondents repeatedly violated the Terms of Use when they accessed USPTO systems to prosecute trademark submissions.

Respondents misused their USPTO.gov accounts to engage in the unauthorized practice of law, provide false information, and improperly enter the signatures of others, including applicants and a U.S.-licensed attorney, on many submissions to circumvent USPTO Rules. These actions constitute violations of the Terms of Use because they exceed the authority of the account user. Respondents also appear to have initially registered the USPTO.gov account they used in the name of a juristic entity, then updated the account information to the names of two different officers on the same day. As noted above, the Trademark Verified USPTO.gov Account Agreement explicitly requires that accounts are solely for use by the individual to whom the account is registered and that only an individual person may use one USPTO.gov account.¹⁵ Considered in conjunction with the filing data referenced above, Respondents’ multiple changes of USPTO.gov registration data indicates that Respondents were also sharing this account across multiple individuals.

Respondents’ misuse of their accounts further indicates their pattern of disregard for USPTO systems and procedures.

III. Sanctions Ordered

The Director has authority to sanction those filing trademark submissions in violation of USPTO Rules and has delegated to the Commissioner for Trademarks the authority to impose such sanctions and to otherwise exercise the Director’s authority in trademark

¹⁵ “I understand that my account is for my sole use and I will not permit others to use the trademark verified USPTO.gov account login credentials issued to me and I will take reasonable steps to prevent others from learning my account login information.” See <https://www.uspto.gov/sites/default/files/documents/TM-verified-account-agreement.pdf> (pg. 2).

matters. 35 U.S.C. §3(a)-(b); 37 C.F.R. §11.18(c); *see also Zhang*, 2021 Commr. Pat. LEXIS 2, at *10, *23-24. The authority to issue administrative sanctions has been further delegated to the Deputy Commissioner for Trademark Examination Policy.

In determining appropriate sanctions, various considerations may be taken into account, including what is needed to deter the conduct by the party and by others and whether: the improper conduct was willful, the conduct was part of a pattern of activity or an isolated event, the conduct infected an entire record or one particular submission, the party has engaged in similar conduct in other matters, the conduct was intended to injure, or the effect of the conduct on the administrative process in time and expense. 73 Fed. Reg. 47650, 47653 (2008); 87 Fed. Reg. 431, 432 (2022).

Respondents were aware of the impropriety of their conduct in filing submissions in the identified applications, and they devised methods to conceal their involvement and advance submissions for an improper purpose, including to disguise that Respondents were representing trademark applicants before the Office without the involvement of licensed U.S. attorneys. In Respondents' efforts to conceal their identities, they entered false signature information, information which is material to the Office's determination to issue a registration. Respondents' actions before the USPTO are particularly egregious in view of the deliberate pattern of submitting trademark documents containing false representations of fact with the intent to circumvent USPTO Rules. *See, e.g., Bose*, 580 F.3d at 1243; *Chutter*, 2021 2021 TTAB LEXIS 365; *Zhang*, 2021 Commr. Pat. LEXIS 2, at *26.

Specifically, Respondents' rule violations were directed at circumventing the rules related to representation of others before the office and the U.S. Counsel Rule through the provision of false signatory information, false attorney information, and forged signatures. *See* 37 C.F.R. §§2.11(a), 2.23, 2.32, 2.193, 11.14, and 11.18(b). Such actions show an intentional effort to mislead the USPTO regarding Respondents' authority in these trademark proceedings, which supports a finding that such false material representations of fact were made knowingly. *Look Cycle*, 2024 TTAB LEXIS 289 at *34 (explaining that fraud can be demonstrated by knowing violations, including those undertaken with reckless disregard for the truth); *Bose*, 580 F.3d at 1243 ("Fraud in procuring a trademark registration or renewal occurs when an applicant knowingly makes false, material representations of fact in connection with his application."); *Chutter*, 2021 TTAB LEXIS 365, at *14; *Fuji*, 2021 TTAB LEXIS 270, at *19-20.

The evidence, including Respondents' admissions, support finding that all submissions were filed in violation of the USPTO Rules and are invalid. The applications and documents were not properly signed, submitted without the identified signatory making a reasonable inquiry into the factual contentions contained therein, and contain false, fictitious, and/or fraudulent information. Respondents' conduct has infected these trademark matters, resulting in false submissions being made to the USPTO that in most if not all cases would render the applications void *ab initio*. Respondents' conduct

adversely affected the integrity of the federal trademark registration process, impairing the USPTO's ability to perform its duty of registering marks that comply with U.S. trademark law, including USPTO Rules. In addition, USPTO records indicate that these submissions were made using USPTO systems in contravention of the Terms of Use.

Due to Respondents' pervasive conduct, the USPTO is unable to rely on any submissions made by Respondents in any of the serial numbers identified in Exhibit A. As a result, the applications identified in Exhibit A, filed by Respondents, are fatally defective because they contain false, material information that cannot be corrected. 37 C.F.R. §§ 2.193(f), 11.18(c); see also *Zhang*, 2021 Commr. Pat. LEXIS 2 at *26-27, (noting that providing false signatures in addition to other misconduct may result in sanctions up to, and including, termination of pending proceedings before the Office); *Dermahose*, 2007 TTAB LEXIS 25, at *9; *Cowan*, 1990 Commr. Pat. LEXIS 24, at *6; see also *Hipkins*, 1991 Pat. App. LEXIS 14, at *10-13. Thus, the applications and other submissions associated with the applications listed in Exhibit A cannot be relied upon and are effectively void. See the following cases in which false statements rendered an application void ab initio: *Aycock Eng'g Inc. v. Airflite*, 560 F.3d 1350, 1356 (Fed. Cir. 2009) (failure to render services and meet the use requirement at the time of filing renders application void ab initio); *Gay Toys, Inc. v. McDonald's Corp.*, 582 F.2d 1067, 1068-69 (CCPA 1978) (application void because applicant was not using mark in commerce at the time of filing where evidence of use comprised a plaster mockup of the identified toy); *Hole In 1 Drinks, Inc. v. Lajtay*, 2020 USPQ2d 10020, at *10 (TTAB 2020) (underlying application void ab initio where individual registrant, at the time application was filed, lacked a bona fide intent to use the mark alone).

Accordingly, in light of Respondents' conduct and the effects of this conduct discussed herein and in the Show Cause Order and their request that the applications be "cancelled without prejudice," the following sanctions under 37 C.F.R. § 11.18(c) are warranted and are hereby imposed:

- (1) Permanently preclude Respondents from submitting trademark-related documents;
- (2) Strike or otherwise give no weight to all trademark-related documents submitted by Respondents;
- (3) Remove correspondence information associated with Respondents from the USPTO's database in all applications and/or registrations;
- (4) Deactivate any USPTO accounts in which contact information related to Respondents appears, and take action to prevent Respondents from creating or activating further accounts;
- (5) Block future financial transactions from credit cards used to pay filing fees associated with the improper submissions and/or associated with Respondents;

(6) Terminate all ongoing application proceedings containing submissions filed by Respondents;¹⁶

(7) For trademark proceedings later found to involve Respondents or containing submissions filed by Respondents, continue to strike documents, remove information, deactivate accounts, block financial transactions, and terminate proceedings.

The sanctions ordered herein are immediately in effect and are ordered without prejudice to the USPTO taking all other appropriate actions to protect its systems and users from Respondents' continued improper activity, including issuing additional orders relating to other applications or registrations, or referring Respondents' conduct to relevant state and federal law enforcement agencies. Considering the widespread and apparently continuing harm being caused to affected applicants, the USPTO may take immediate mitigation actions, including suspending further action in impacted applications and/or restricting access to USPTO.gov accounts associated with Respondents.¹⁷

So ordered,

Amy P. Cotton
Deputy Commissioner for
Trademark Examination Policy

June 13, 2025

Date

on delegated authority by

Coke Morgan Stewart
Acting Under Secretary of Commerce for Intellectual Property and
Acting Director of the United States Patent & Trademark Office

¹⁶ An owner of a terminated application proceeding may file a new application for registration of their mark that complies with the USPTO Rules and Terms of Use. This sanction is consistent with Respondents' second prayer for relief, which requests cancellation of the applications without prejudice.

¹⁷ If a preliminary action taken by the USPTO in this matter is later determined to have been done in error, such action may be undone.

CERTIFICATE OF SERVICE

I certify that on **June 13, 2025**, the foregoing Final Order was sent to Respondents at the following email addresses.

Via Email:

info@stelcoreadvisors.in
support@stelcore.in
support@stelcoregroup.com
[REDACTED]

United States Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

Exhibit A

Serial Number	Literal Element	Filing Date
88023953	SUAVE COTTON	7/3/2018
88060533	FUERTE ALOE	8/1/2018
88236240	LUXE DU COTTON	12/20/2018
88238270	LINEN WEAVE	12/21/2018
88238327	LUXE DU COTTON	12/21/2018
88302613	DIVINE INDIA	2/15/2019
88418333	THE INDIAN KITCHEN FOODS COMPANY	5/7/2019
88429025	ANNAFIINDIA	5/14/2019
88452033	LEARICHI	5/30/2019
88467545	REESE BEDDING	6/11/2019
88489304	BELLA VITA NATURE INSPIRED WELLNESS	6/26/2019
88493128	ROYAL FURNISH	6/28/2019
88553670	BED ALTER	7/31/2019
88584776	NISAKI	8/20/2019
88610469	MERAKI DESIGNS	9/10/2019
88616981	INDUSVALLEY	9/14/2019
88616980	INDUS VALLEY	9/14/2019
88823539	ESSENZA JEWELS	3/6/2020
90198449	PARTH IMPEX	9/22/2020
90198704	COMU HOME	9/22/2020
90198683	ZUCI	9/22/2020
90198487	SKYLE	9/22/2020