## WITHOUT PREJUDICE

June 11, 2025

Ref: RSA/IOA/I6718/1789

To:

Taekwondo Federation of India, A-2, 2<sup>nd</sup> Floor, 32/16, Valmiki Marg, Hazratganj Lucknow- 226001

Re: Legal Notice regarding the unauthorized use of our client Indian

Olympic Association's Logo and affiliation status without their consent.

**Our Client**: Indian Olympic Association of Olympic Bhawan, B-29, Qutab Institutional Area, New Delhi-110 016 (hereinafter referred to as '**IOA'**)

Sir/Madam,

We write to you on behalf of and under the instructions of our client abovenamed. Any reference to our client shall hereinafter refer to and include its predecessors, subsidiaries, affiliates, licensees and we serve upon you this legal notice as follows:

1. It has come to our client's attention that you, your agents, assignees, representatives, successors, distributors, directors, partners and other entities acting on your behalf, or under your instructions are using the logo

of our client, being " " without any due authorization from our client.

2. Our client, as you are well aware, is an organization registered under Indian Societies Registration Act, 1860. It operates as a non-profit organization and has jurisdiction all over India. It is also acknowledged as the Ultimate and Supreme Authority for Olympic related games in India. In line with the International Olympic Committee's Olympic Charter (hereinafter referred to as the 'Olympic Charter'), the IOA cultivates, advances, and defends the

Olympic movement in India. Our client is an affiliated member of The Olympic Council of Asia (hereinafter referred to as '**OCA**'), the Association of National Olympic Committees (hereinafter referred to as '**ANOC**'), the Commonwealth Games Federation (hereinafter referred to as '**CGF**'), and the International Olympic Committee (hereinafter referred to as '**IOC**').

- 3. Our client, as the sole authority for Olympic related games in India, has been involved with a variety of National Sports Federations, State Olympic Associations, IOC Members, and other multi-sport organizations, as well as the Winter Olympic Games, Asian Games, and Commonwealth Games since their incorporation in 1927. Throughout their business and non-business activities, our client has sincerely developed and created their unique logo
  - , which has been widely utilized in connection with the Organization and Sports Events in India, and throughout the world.
- 4. Our client originally came up with and introduced their logo in India, used individually or in conjunction with their incorporated name **Indian Olympic Association**, in the trading community.
- 5. Our client has made significant efforts and has invested large sums of money in advertising, promoting and marketing in order to popularize their logo. The same has been advertised in both electronic and printed media, having widespread reach and circulation in India and other parts of the world.
- 6. Our client has an active website, which can be accessed as under <a href="https://olympic.ind.in/">https://olympic.ind.in/</a>, wherein its trademark and logo has been promoted.
- 7. In accordance with the responsibilities entrusted to our client, our client is the ultimate authority to grant **affiliation status** and/or **recognition** to any Sport Federation throughout the nation, in cooperation and collaboration with the applicable International Sport Federation. Our client is the flag bearer of the country of India for all Olympic Games, being active all over the world and as such is a well-known organisation. Furthermore, the **Affiliation** status with our client instantly results in an immediate assumption of association with the Indian Olympic Association and ultimately, the high and well-known value image of our client.

- 8. The affiliation status is granted to only such Sports Federations' who have duly complied with the international and national sports codes and is included in the programme of the summer and winter Olympic Games. Such affiliation is granted after deliberate consideration and due scrutiny of such compliance.
- 9. It has become apparent that the **Taekwondo Federation of India** is falsely using the name and/or affiliation status of our client without any due authorization. It has done so to exploit the popularity of our client and gain benefits of a commercial nature from it. Our client is concerned about this dishonest behaviour of yours, which appears to exploit our client's rights.
- 10. The unauthorized adoption and utilization of our client's reputed and well-known name without the express permission and authorization has led to a violation of their Legal Rights. As such, our client is concerned about the misuse of their name by you and is willing to take further legal action if there is any further unauthorized use of the name/mark in the future, including but not limited to, *inter alia*, seeking compensation for damages and costs for loss of goodwill, etc.
- 12. Indian Olympic Association administers various aspects of sports governance and athletes' welfare in the country. In this regard, our client oversees the representation of athletes or teams participating in the Olympic Games, Commonwealth Games, Asian Games and other international multi-sport competitions of the above named IOC, CGF, OCA and ANOC and is recognized by the Ministry of Youth Affairs and Sports. Our client is the proprietor of the

logo , which has become a global brand and its use on any product or service would result in an immediate assumption of association with Indian Olympic Association.

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- 13. That the continuous use of the Indian Olympic Association's logo various regions of the country, by our client, has established a unique position in the minds of consumers and traders which has made it an exclusive property of our client as well as its parent organization.
- 14. Our client is the legitimate owner of all Intellectual Property and legal rights in and the Olympic Games and Olympic properties, including trademarks, copyrights, device mark of flame and torches, Olympic symbol and rings, flag, the motto, anthem, identifications, designations and emblems along with other such marks as registered by our client in India in compliance with and under the Olympic Charter and The Nairobi Treaty on the Protection of the Olympic Symbol, 1981(hereinafter referred to as the 'Nairobi Treaty').

15. Please be informed that you have used the logo , belonging to our client, without the express and written consent of our client, thereby leading to infringement of the Intellectual Property Rights of our client.

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- 16. Our client has the exclusive right to use the said logo and nobody can use the same or any other identical logo which is deceptively similar to ours in any manner whatsoever without the express and written authorization of our client. It is pertinent to mention herein that if any individual or entity engages in such actions, our client has the right to take action against such unauthorized and unconsented use of the trademark of our client including but not limited to instituting appropriate litigations against such blatant infringement on the rights of our client.
- 17. Our client has **Proprietary and Statutory Rights** for use of its logo way of plurality of valid and subsisting registrations and / or applications that are proceeding towards registration under **The Trade Marks Act, 1999** (hereinafter referred to as the "said Act of 1999") in various forms and manners and under various classes of sports, which permits and/or authorizes our client to use, hold, exploit, practice, profess and commercialize

the said logo  $\stackrel{|\mathbf{NDIA}|}{\curvearrowleft}$  per se, in all and/or any form or manner whatsoever.

- 18. As the owner of the logo ' , our client has exclusive rights which are granted to them **under section 28** of the said Act of 1999 to obtain relief in respect of infringement of such registered trademark(s).
- 19. Furthermore, our client has aggressively expanded its footprint in the field of Sports and other sectors globally through the IOC and other affiliated organizations.
- 20. It has come to our client's attention that you, your agents, assignees, representatives, successors, distributors, directors, partners and other

entities acting on your behalf are using the logo without any due authorization and/or permission from our client. You have done so in order to derive a benefit either of a commercial nature, or otherwise, from its popularity. It is evident from the above assertions that you have adopted the logo and falsely acclaimed yourself as an affiliated body to our client in order to hamper our client's goodwill and reputation and / or seek commercial benefit thereof. Our client is concerned about this dishonest behavior of

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yours, which appears to exploit our client's unique Intellectual Property Rights. Our client believes that through such representation, as made by you, the public will be misled into thinking that your organization is affiliated and/or connected to our client. This is an infringement of our client's intellectual property rights and constitutes infringement of the trademark of our client in violation of the said Act of 1999. As a result of your unauthorized

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use of such trademark, our client believes that your use of their logo will establish a false relationship between you and our client, damage the goodwill and reputation of our client while also violating our clients proprietary and legal rights pertaining to such registered trademark. As such, these actions undertaken by you also amounts to, *inter alia*, 'Passing Off' under Section 27 of the said Act of 1999 as a result of the deception and confusion caused by your adoption and use of the registered trademark of our client.

- 21. It is pertinent to mention herein that you are not linked and/or connected to our client in any manner whatsoever and as such the adoption of the
  - renowned, well known and registered logo of our client clearly portrays your mala fide intention to mislead the public into believing your association with the Indian Olympic Association resulting in the dilution of the rights of our client and their affiliated entities and/or parties.

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22. The unauthorized adoption and utilization of our clients reputed and well

known logo without the express permission and authorization from our client has led to wrongful affiliation and violation of their Intellectual Property Rights. As such, our client is highly concerned about the misuse of their logo

by you and is willing to take further legal action if there is any further unauthorized use of the mark in the future, including but not limited to, *inter alia*, seeking compensation for damages and costs for loss of goodwill, etc. As

such, we ask that you **Immediately Cease** from using the logo and the said wrongful affiliation to our client, thereby **recalling all notifications** and taking **down all posts** on your social media, *inter alia*, posters, advertisements and any and all online and offline content, through which you may have attempted to get associated with our client or use the logo of our client in such unauthorized way. You are also further directed to refrain from using any other logo, which is identical or deceptively confusing or similar to our client's

INDIA logo , or any related mark, which might create a confusion in the minds

of the consumers about the affiliation and/or connection our client with you. A copy of the letter and advertisement issued by you containing our logo and wrongful affiliation has been attached herewith and marked as 'Annexure X'.

- 23. That our client expects you to provide a written undertaking stating that you recognize our client's trademark and thus promise not to use, sell, promote, or list the logo in the future as a domain name, trading name or use the same in any other manner which might cause confusion in the minds of the consumers in relation to your association with our client's and / or their trademarks.
- 24. Our client reserves the right to seek compensation for damages incurred due india to your unauthorized use of our client's logo . This may include legal costs, reputational damage, and any other losses suffered by our client.
- 25. In the event you fail to comply with the above **within 72 hours** from the receipt of this notice, our client will be constrained to initiate appropriate civil as well as criminal proceedings against you, to protect their rights and interests and such proceedings will be at your sole risk, cost and consequence. The legal costs associated with this legal notice are an amount of Rs. 20,000/- (Rupees Twenty Thousand Only), which you are required to remit by way of a Cheque / Demand Draft drawn in favour of the "**INDIAN OLYMPIC ASSOCIATION**".
- 26. This notice is issued without prejudice to the rights and remedies available to our client in law.

Thanks & Regards,

For R. Singh & Associates

**Advocate** 

C. C. Indian Olympic Association,Olympic Bhawan,B-29, Qutab Institutional Area,New Delhi-110 016.



**REGISTRATION NO: 1695 / 1982-83** 

Recognized by: Ministry Of Youth Affairs & Sports, Government of India / Affiliated to : Indian Olympic Association

Registered Office: A-2, Second Floor, 32/16, Valmiki Marg, Hazratganj, Lucknow: 226001.

Correspondence Address: Taekwondo Training Hall, Dr. B.R. Ambedkar Stadium, Basaveshwara Nagar, Bengaluru: 560079.

Mob: 8698690793 / Email: indtkd17@gmail.com / secretarygeneraltfi22@gmail.com

DR. ISHARI. K. GANESH President ADV. R.D. MANGUESHKAR Secretary General

Shri. JASBIR SINGH GILL Treasurer.

Date: 05/06/2025

To:

## The President / Secretary

All the Affiliated State Taekwondo Association / Central Organization.

## **INVITATION**

Dear Sirs,

We are happy to inform, that **Andhra Pradesh Taekwondo Association**, under the aegis of **Taekwondo Federation of India**, is Organizing **10**<sup>th</sup> **National Open Kyorugi & Poomsae Taekwondo Championships : 2025** from 25<sup>th</sup> to 27<sup>th</sup> July 2025 at Chennupati Rama Kotaiah Indoor Stadium, Vijayawada, Andhra Pradesh.

We cordially invite you and your teams to participate in the Championship. There is no restriction for participation from a State in a weight Category. Criteria for participation in above Championships is as follows:-

- Sub-Junior Boy & Girl Athletes aged between 7 & 11+ Years (Born between 01/01/2014 & 31/12/2018) are eligible in both Kyorugi & Poomsae Events. Athletes should be holder of Green Belt & above Certificate issued by our affiliated STA.
- 2. Cadet Boy & Girl Athletes aged between 12 & 14 Years (Born between 01/01/2011 & 31/12/2013) are eligible in both Kyorugi & Poomsae Events. Athletes should be holder of Green Belt & above Certificate issued by our affiliated STA.
- Junior Male & Female Athletes aged between 15 & 17 Years (Born between 01/01/2008 & 31/12/2010) are eligible in both Kyorugi & Poomsae Events. Athletes should be holder of Kukkiwon 1<sup>st</sup> Dan & above Certificate.



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Correspondence Address: Taekwondo Training Hall, Dr. B.R. Ambedkar Stadium, Basaveshwara Nagar, Bengaluru: 560079.

Mob: 8698690793 / Email: indtkd17@gmail.com / secretarygeneraltfi22@gmail.com

DR. ISHARI. K. GANESH President ADV. R.D. MANGUESHKAR Secretary General

Shri. JASBIR SINGH GILL Treasurer.

- 4. Senior Male & Female Athletes aged 17 Years & Above (Born on or before 31/12/2008) are eligible in **Kyorugi Events**. Athletes should be holder of Kukkiwon 1<sup>st</sup> Dan & above Certificate.
- 5. Senior Male & Female Athletes aged 18 Years & Above (Born on or before 31/12/2007) are eligible in **Poomsae Events**. Athlete should be holder of Kukkiwon 1<sup>st</sup> Dan & above Certificate.
- 6. One athlete can participate in only two events in Poomsae division.

Age will be calculated based on the year 2025. Holder of TFI ID Card & recommended by the President / Secretary of Affiliated State Taekwondo Association / Organization are eligible. We are enclosing the following:-

- 1. Outline Information & Rules for Participation
- 2. Team Officials & Individual Entry Forms

Athletes who are eligible to participate in Junior & Senior Division should be Kukkiwon Black Belt holders. Sub-Junior & Cadet Athletes who are eligible to participate in the Championships should be Green Belt & above Certificate holder. The last date for submission of Entry along with Photos and relevant documents is 20/07/2025 positively. Entry Fees should be paid in cash at the time of Registration of athletes.

We solicit your Teams Active Participation to make this Championship a Grand Success. Andhra Pradesh Taekwondo Association & Taekwondo Federation of India are making every possible effort to make this Championship a successful one.

With warm & kind regards.

Adv. RD Mangueshkar Se¢retary General.







युवा कार्यक्रम एवं खेल मंत्रालय MINISTRY OF YOUTH AFFAIRS AND SPORTS



## 10TH NATIONAL OPEN KYORUGI & POOMSAE TAEKWONDO CHAMPIONSHIPS: 2025

Organised by:The Krishna District Taekwondo Association
Under Ageis of: Andhra Pradesh pradesh Taekwondo Association
Affliated by:Ministry of Youth Affaiars and Indian Olympic Association
Recognized by: Taekwondo Federation of India











From 25th to 27th July 2025

Venue:

CHENNUPATI RAMA KOTAIAH INDOOR STADIUM, VIJAYAWADA, ANDHRA PRADESH.



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