

## **ADMINISTRATIVE PANEL DECISION**

Tottenham Hotspur Limited v. Gideon Estes, Thomas Lathrop  
Case No. D2026-0327

### **1. The Parties**

The Complainant is Tottenham Hotspur Limited, United Kingdom (“UK”), represented by Wiggin LLP, UK.

The Respondent is Gideon Estes, United States of America (“US”); Thomas Lathrop, US.

### **2. The Domain Names and Registrar**

The disputed domain names <tottenhamhotspurfcshirts.com>, <tottenhamhotspurfcshop.com>, <tottenhamhotspurjersey.com>, <tottenhamhotspurkit.com>, <tottenhamhotspurshirt.com>, and <tottenhamhotspurshirts.com> are registered with Dynadot, Inc. (the “Registrar”).

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on January 27, 2026. On January 27, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On January 28, 2026, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain names which differed from the named Respondent (Persons Unknown) and contact information in the Complaint.

The Center sent an email communication to the Complainant on February 6, 2026, with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrar, requesting the Complainant to either file separate complaint(s) for the disputed domain names associated with different underlying registrants or alternatively, demonstrate that the underlying registrants are in fact the same entity and/or that all domain names are under common control. The Complainant filed an amended Complaint on February 11, 2026.

The Center verified that the Complaint together with the amended Complaint satisfied the formal requirements of the Uniform Domain Name Dispute Resolution Policy (the “Policy” or “UDRP”), the Rules for Uniform Domain Name Dispute Resolution Policy (the “Rules”), and the WIPO Supplemental Rules for Uniform Domain Name Dispute Resolution Policy (the “Supplemental Rules”).






In accordance with the Rules, paragraphs 2 and 4, the Center formally notified the Respondent of the Complaint, and the proceedings commenced on February 12, 2026. In accordance with the Rules, paragraph 5, the due date for Response was March 4, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on March 5, 2026.

The Center appointed Kiyoshi Tsuru as the sole panelist in this matter on March 13, 2026. The Panel finds that it was properly constituted. The Panel has submitted the Statement of Acceptance and Declaration of Impartiality and Independence, as required by the Center to ensure compliance with the Rules, paragraph 7.

#### 4. Factual Background

The Complainant is Tottenham Hotspur Limited, a private limited company incorporated in the UK on March 14, 1983. The Complainant operates a well-known professional football club, which was founded in 1882. The Complainant also operates an official online store through which it offers branded merchandise including football kits, clothing, and related goods.

The Complainant owns multiple registered TOTTENHAM HOTSPUR trademarks worldwide, including UK, European Union (“EU”), and US registrations for clothing (Class 25). These trademarks include the well-known cockerel on the ball logo. Among other trademark registrations around the world, the Complainant owns the following:

Territory	Reg. No.	Trademark	Registration Date	Class(es)
EU	001899749	TOTTENHAM HOTSPUR	March 31, 2004	25 (among others)
EU	011681459	TOTTENHAM HOTSPUR	November 20, 2013	25, 35 (among others)
UK	UK00001199577	TOTTENHAM HOTSPUR	July 13, 1983	25 (among others)
UK	UK00911681459	TOTTENHAM HOTSPUR	November 20, 2013	25, 35 (among others)
US	2980045	TOTTENHAM HOTSPUR	July 26, 2005	25 (among others)
International	1211256	TOTTENHAM HOTSPUR	March 28, 2013	25, 35 (among others)
EU	004835229		May 22, 2007	25, 35 (among others)
EU	011701811		November 20, 2013	25, 35 (among others)
UK	UK00904835229		May 22, 2007	25, 35 (among others)
UK	UK00911701811		November 20, 2013	25, 35 (among others)
International	1211009		April 2, 2013	25, 35 (among others)

The Complainant sells a range of official merchandise goods featuring TOTTENHAM HOTSPUR and its cockerel on ball logo on its website “[www.shop.tottenhamhotspur.com](http://www.shop.tottenhamhotspur.com)”, including clothing.

The disputed domain names have been registered in a relatively short period from June 9, 2024 in relation to <tottenhamhotspurshirt.com>, <tottenhamhotspurshirts.com>, <tottenhamhotspurjersey.com> and <tottenhamhotspurkit.com> to July 22, 2025 in relation to <tottenhamhotspurfshop.com> and <tottenhamhotspurfshirts.com>.

The disputed domain names resolved to websites purporting to sell merchandise bearing the Complainant's TOTTENHAM HOTSPUR trademark, which seems to be counterfeit merchandise. Such websites reproduced the Complainant's trademark and branding elements, suggested that the products offered were official merchandise, and offered football shirts and related goods, including customized items, at prices substantially lower than those available on the Complainant's official online store. In addition, such websites included statements, such as: "100% Official Merchandise Buy With Confidence". The disputed domain names are currently inactive.

## **5. Parties' Contentions**

### **A. Complainant**

The Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the disputed domain names.

Notably, the Complainant contends the following:

#### **I. Identical or confusingly similar**

That the disputed domain names are highly similar to the Complainant's registered trademarks, which are entirely incorporated in the said disputed domain names. That said disputed domain names also incorporate the entirety of the protected and distinctive "Tottenham Hotspur" term.

That the additional suffix "shirt" (or "shirts"), "fcshop", "fcshirts", "jersey" and/or "kit" are each descriptive for sports clothing, a football club and/or storefront.

That the incorporation of a trademark in its entirety may be sufficient to establish that a domain name is identical or confusingly similar to a complainant's trademark rights.

That the Top-Level Domain, ".com" is disregarded when evaluating whether a domain name is identical or confusingly similar to a trademark.

#### **II. Rights or legitimate interests**

That the Complainant has no relationship with the Respondent and that the disputed domain names were registered without its consent.

That the Respondent is using the disputed domain names to resolve to websites that make available to users an online counterfeit store.

That the Respondent's activity to imitate the Complainant's official Club Shop for selling counterfeit merchandise clearly indicates a lack of rights and/or legitimate interests in the disputed domain names.

That the Respondent registered the disputed domain names in bad faith to sell counterfeit goods, divert customers from the Complainant's official website, and improperly obtain users' payment details by impersonating the Complainant's trademarks and official online storefront.

### III. Registered and used in bad faith

That the Complainant sells official Tottenham Hotspur merchandise through its authorized online store, while the Respondent uses the disputed domain names without consent to sell counterfeit goods or fraudulently solicit payment details.

That the websites to which the disputed domain names resolve entirely reproduce the Complainant's registered trademarks and logos, falsely claim official affiliation, offer heavily discounted prices indicative of counterfeit products, and replicate the look and feel of the Complainant's official storefront.

That the disputed domain names resolve to websites that include unauthorized "customization" services, and, offered third-party branded footwear, which is inconsistent with the Complainant's authorized merchandise, and further evidences deceptive conduct, demonstrating deliberate deception and bad-faith use of the disputed domain names.

### B. Respondent

The Respondent did not reply to the Complainant's contentions.

## 6. Discussion and Findings

Paragraph 4(a) of the Policy sets out the three requirements that the complainants must prove in order to successfully request remedies:

(i) that the disputed domain name is identical or confusingly similar to a trademark or service mark to which the complainant has rights;

(ii) that the respondent has no rights or legitimate interests in connection with the disputed domain name; and

(iii) that the disputed domain name has been registered and is being used in bad faith.

Given the Respondent's default and therefore, failure to specifically address the case merits as they relate to the three UDRP elements, the Panel may decide this proceeding based on the Complainants' undisputed factual allegations under paragraphs 5(f), 14(a), and 15(a) of the Rules (see *Joseph Phelps Vineyards LLC v. NOLDC, Inc., Alternative Identity, Inc., and Kentech*, WIPO Case No. [D2006-0292](#); *Groupe Auchan v. Roberto La Palombara*, WIPO Case No. [D2014-0660](#); see also WIPO Overview of WIPO Panel Views on Select UDRP Questions ("[WIPO Overview 3.1](#)"), section 4.3).

### Consolidation: Multiple Respondents

The amended Complaint was filed in relation to nominally different domain name registrants. The Complainant alleges that the domain name registrants are the same entity or mere alter egos of each other, or under common control. The Complainant requests the consolidation of the Complaint against the multiple disputed domain name registrants pursuant to paragraph 10(e) of the Rules.

The disputed domain name registrants did not comment on the Complainant's request.

Paragraph 3(c) of the Rules states that a complaint may relate to more than one domain name, provided that the domain names are registered by the same domain name holder.

In addressing the Complainant's request, the Panel will consider whether (i) the disputed domain names or corresponding websites are subject to common control; and (ii) the consolidation would be fair and equitable to all Parties. See [WIPO Overview 3.1](#), section 4.11.2.

As regards common control, the Panel notes that all disputed domain names use the same privacy service and are registered with the same registrar (Dynadot, Inc.). Each of them resolves to an identical website impersonating the Complainant's official Club Shop, reproducing the Complainant's trademarks and including the sale of counterfeit goods and third-party branded unauthorized "footwear" and "customization" options.

The disputed domain names were registered within a short, continuous period (June 2024–July 2025), follow a consistent naming pattern incorporating the Complainant's TOTTENHAM HOTSPUR trademark, and collectively demonstrate a clear pattern of registrations. Collectively, these circumstances strongly support the finding of shared operational control and justify consolidation. See *Veja Fair Trade, SARL v. Domain Admin, Whoisprotection.cc, Client Care, Web Commerce Communications Limited*, WIPO Case No. [D2023-3209](#); and *Speedo Holdings B.V. v. Programmer, Miss Kathy Beckerson, John Smitt, Matthew Simmons*, WIPO Case No. [D2010-0281](#).

As regards fairness and equity, the Panel sees no reason why consolidation of the disputes would be unfair or inequitable to any Party.

Accordingly, the Panel decides to consolidate the disputes regarding the nominally different disputed domain name registrants (referred to herein as "the Respondent") in a single proceeding.

### **A. Identical or Confusingly Similar**

It is well accepted that the first element functions primarily as a standing requirement. The standing (or threshold) test for confusing similarity involves a reasoned but relatively straightforward comparison between the Complainant's trademark and the disputed domain names. [WIPO Overview 3.1](#), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The Panel finds the mark is recognizable within the disputed domain names. Accordingly, the disputed domain names are confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

The Panel finds that the Complainant's TOTTENHAM HOTSPUR trademark is recognizable within each of the disputed domain names. Each disputed domain name incorporates the Complainant's trademark in its entirety, followed by terms relating to football merchandise or retail activity, namely "fcshirts", "fcshop", "jersey", "kit", "shirt", and "shirts".

The addition of the Top Level Domain ".com" to the disputed domain names is immaterial for purposes of assessing confusing similarity because it is a technical requirement of the Domain Name System (see *CARACOLITO S SAS v. Nelson Brown, OXM.CO*, WIPO Case No. [D2020-0268](#); and *Bentley Motors Limited v. Domain Admin / Kyle Rocheleau, Privacy Hero Inc.*, WIPO Case No. [D2014-1919](#)).

The Panel finds the first element of the Policy has been established.

### **B. Rights or Legitimate Interests**

Paragraph 4(c) of the Policy provides a list of circumstances in which the Respondent may demonstrate rights or legitimate interests in a disputed domain name.

Although the overall burden of proof in UDRP proceedings is on the complainant, panels have recognized that proving that a respondent lacks rights or legitimate interests in a domain name may result in the difficult task of "proving a negative", requiring information that is often primarily within the knowledge or control of the respondent. As such, where a complainant makes out a prima facie case that the respondent lacks rights or legitimate interests, the burden of production on this element shifts to the respondent to come forward with relevant evidence demonstrating rights or legitimate interests in the domain name (although the burden of proof always remains on the complainant). If the respondent fails to come forward with such relevant

evidence, the complainant is deemed to have satisfied the second element. [WIPO Overview 3.1](#), section 2.1.

Having reviewed the available record, the Panel finds the Complainant has established a prima facie case that the Respondent lacks rights or legitimate interests in the disputed domain names. The Respondent has not rebutted the Complainant's prima facie showing and has not come forward with any relevant evidence demonstrating rights or legitimate interests in the disputed domain names such as those enumerated in the Policy or otherwise (see *Accor v. Eren Atesmen*, WIPO Case No. [D2009-0701](#)).

Panels have held that the use of a domain name for illegal activity, including sale of counterfeit goods, phishing, copycat sites, passing off, or other types of fraud, can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.1](#), section 2.13.1.

The Panel notes that the Complainant has not authorized the Respondent to use its TOTTENHAM HOTSPUR trademark, that the Respondent is not affiliated with the Complainant, and that there is no evidence that the Respondent is commonly known by the disputed domain names. The record shows that the disputed domain names resolved to websites reproducing the Complainant's trademark and branding while purporting to sell Tottenham Hotspur merchandise, falsely suggesting that the websites to which the disputed domain names resolve are affiliated with the Complainant. Such use does not constitute a bona fide offering of goods or services nor a legitimate noncommercial or fair use of the disputed domain names (see *Prada S.A. v. Domains For Life*, WIPO Case No. [D2004-1019](#)).

The Panel finds the second element of the Policy has been established.

### **C. Registered and Used in Bad Faith**

The Panel notes that, for the purposes of paragraph 4(a)(iii) of the Policy, paragraph 4(b) of the Policy establishes circumstances, in particular, but without limitation, that, if found by the Panel to be present, shall be evidence of the registration and use of a domain name in bad faith.

Paragraph 4(b) of the Policy sets out a list of non-exhaustive circumstances that may indicate that a domain name was registered and used in bad faith, but other circumstances may be relevant in assessing whether a respondent's registration and use of a domain name is in bad faith. [WIPO Overview 3.1](#), section 3.2.1.

In the present case, the Panel notes that the Respondent registered and used the disputed domain names to attract Internet users to websites that offer Tottenham Hotspur-branded merchandise while reproducing the Complainant's TOTTENHAM HOTSPUR trademark and related branding elements. The disputed domain names incorporate the Complainant's trademark in its entirety together with terms directly referring to football merchandise and retail activity, such as "shirt", "shirts", "jersey", "kit", "fcshop", and "fcshirts". The composition of the disputed domain names therefore suggests an association with the Complainant and its official merchandise store.

The Panel considers that such use falls within the circumstance described in paragraph 4(b)(iv) of the Policy, namely using a domain name to intentionally attempt to attract, for commercial gain, Internet users to a website by creating a likelihood of confusion with the Complainant's mark as to the source, sponsorship, affiliation, or endorsement of the website or of the products offered on it.

The Panel further notes that the inclusion of third-party branded products on the websites to which the disputed domain names resolved, presented as part of a purported "official" Tottenham Hotspur online shop, reinforces the misleading character of the Respondent's websites, and supports a finding of likely confusion as to source or affiliation.

In addition, the Panel notes that the disputed domain names were registered well after the Complainant had established trademark rights in Tottenham Hotspur, and that the Respondent registered multiple disputed domain names incorporating the Complainant's trademarks together with terms specifically referring to football merchandise. These circumstances support the inference that the Respondent was aware of the

Complainant and its trademark rights at the time of registration and deliberately targeted the Complainant's trademark.

Panels have held that the use of a domain name for illegal or illegitimate activity including the sale of counterfeit goods, copycat websites, passing off, or other types of fraud constitutes bad faith. [WIPO Overview 3.1](#), section 3.4. Having reviewed the record, the Panel finds that the Respondent's use of the disputed domain names falls within this category, as evidenced by the offer of purported counterfeit goods at discounted prices compared to the Complainant's official store. The evidence submitted by the Complainant indicates that the disputed domain names were used in connection with websites that reproduced the Complainant's trademark and purported to offer Tottenham Hotspur merchandise for sale suggesting that the websites were affiliated with or authorized by the Complainant. Such use creates a likelihood of confusion and indicates an intent to capitalize on the reputation of the Complainant's trademark for commercial gain. See *Mattel, Inc. v. Magic 8 ball factory*, WIPO Case No. [D2013-0058](#); and *Skorpio Limited v Jianhua Xing*, WIPO Case No. [D2022-0555](#).

The Panel finds that the Complainant has established the third element of the Policy.

## 7. Decision

For the foregoing reasons, in accordance with paragraphs 4(i) of the Policy and 15 of the Rules, the Panel orders that the disputed domain names <tottenhamhotspurfcshirts.com>, <tottenhamhotspurfcshop.com>, <tottenhamhotspurjersey.com>, <tottenhamhotspurkit.com>, <tottenhamhotspurshirt.com>, and <tottenhamhotspurshirts.com> be transferred to the Complainant.

*/Kiyoshi Tsuru/*

**Kiyoshi Tsuru**

Sole Panelist

Date: March 27, 2026