

## **ADMINISTRATIVE PANEL DECISION**

Husch Blackwell LLP v. Ari Franklinos

Case No. D2025-2060

### **1. The Parties**

The Complainant is Husch Blackwell LLP, United States of America ("United States"), represented internally.

The Respondent is Ari Franklinos, United Kingdom.

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

The disputed domain name <kinhusblacwell.com> is registered with Ultahost, Inc. (the "Registrar").

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on May 23, 2025. On May 26, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On May 26, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain name which differed from the named Respondent (Ultahost, Inc.) and contact information in the Complaint. The Center sent an email communication to the Complainant on June 3, 2025, providing the registrant and contact information disclosed by the Registrar, and inviting the Complainant to submit an amendment to the Complaint. The Complainant filed an amended Complaint on June 9, 2025.

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 July 4, 2025. In accordance with the Rules, paragraph 5, the due date for Response was July 24, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on August 6, 2025.

The Center appointed Assen Alexiev as the sole panelist in this matter on August 12, 2025. 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 a law firm with over 1000 attorneys in 20 offices across the United States. It is active in litigation, corporate law, healthcare law, real estate law, trusts and estates, and other practice areas. The Complainant states that it has used the brand HUSCH BLACKWELL since August 2010 in connection with its legal services.

The Complainant is the owner of a number of trademark registrations for the sign HUSCH BLACKWELL (the “HUSCH BLACKWELL trademark”), including the following representative registrations:

- the United States trademark HUSCH BLACKWELL with registration No. 4139114, registered on May 8, 2012 for services in International Class 45; and
- the United Kingdom trademark HUSCH BLACKWELL with registration No. UK00910730811, registered on July 25, 2012 for services in International Class 45.

The Complainant is also the owner of the domain name <huschblackwell.com>, registered on September 28, 2007, which resolves to its official website.

The disputed domain name was registered on February 18, 2025. It is currently inactive. The Complainant has submitted a letter as evidence which invites its recipient to claim a life insurance policy worth more than USD 11 million of an unrelated deceased person. The letter is sent by a person claiming to be an attorney at the law firm “King Husch & Blackwell LLP” and indicates in its letterhead a website and an email address at the disputed domain name.

#### **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 name.

The Complainant states that the disputed domain name is confusingly similar to its HUSCH BLACKWELL trademark, because it represents a misspelled version of this trademark.

According to the Complainant, the Respondent has no rights or legitimate interests in respect of the disputed domain name, because it is not commonly known by it, has no relevant trademark rights, and the Complainant has not authorized it to use the HUSCH BLACKWELL trademark. The Complainant maintains that the Respondent has registered the disputed domain name primarily to pass itself off as a law firm to conduct a phishing scheme.

The Complainant contends that the disputed domain name was registered and is being used in bad faith. It notes that it had already used the HUSCH BLACKWELL trademark for over a decade when the Respondent registered the disputed domain name in 2025. According to the Complainant, the Respondent is using the disputed domain name, which is a typosquatted version of the Complainant’s trademark, to carry out a phishing scheme based on the notoriety of the same trademark. In this regard, the Complainant submits as evidence a copy of a letter sent by a person claiming to be an attorney at a law firm under the name “King Husch & Blackwell LLP Barrister & Solicitors”. This letter indicates on its letterhead this law firm name next to website and email addresses at the disputed domain name, and contains a proposal to the recipient of the letter to claim an unclaimed life insurance policy worth more than USD 11 million of an unrelated deceased person having the same family name and nationality as the recipient of the letter, to share the received amount with the sender of the letter, and to send his or her full name and contact telephone number to the sender of the letter in order to participate in the proposed scheme. According to the Complainant, the law firm named in this letter does not exist and its address is fake.

The Complainant submits that it sent a cease-and-desist letter to the Respondent on March 31, 2025, but received no response.

## **B. Respondent**

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

## **6. Discussion and Findings**

### **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 name. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition, ("[WIPO Overview 3.0](#)"), section 1.7.

The Complainant has shown rights in respect of the HUSCH BLACKWELL trademark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

As discussed in section 1.9 of the [WIPO Overview 3.0](#), a domain name which consists of a common, obvious, or intentional misspelling of a trademark is considered by panels to be confusingly similar to the relevant mark for purposes of the first element. This stems from the fact that the domain name contains sufficiently recognizable aspects of the relevant mark. Under the second and third elements, panels will normally find that employing a misspelling in this way signals an intention on the part of the respondent to confuse users seeking or expecting the complainant.

Panels have also found that the overall facts and circumstances of a case may support a finding of confusing similarity, particularly where it appears that the respondent registered the domain name precisely because it believed that the domain name was confusingly similar to a mark held by the complainant. [WIPO Overview 3.0](#), section 1.7.

Here, the disputed domain name contains sufficiently recognizable elements of the Complainant's HUSCH BLACKWELL trademark. It can be regarded as consisting of the elements "kin", "hus" and "blacwell", and the last two of these appear as a misspelled version of the HUSCH BLACKWELL trademark. The inclusion of these two elements makes the same trademark recognizable in the disputed domain name, which supports a conclusion that it is confusingly similar to the Complainant's trademark.

The letter, submitted by the Complainant, issued by a person claiming to be an attorney at a law firm with the name "King Husch & Blackwell LLP" indicates in its letterhead the name of this law firm next to website and email addresses at the disputed domain name. The Panel considers as likely that the sender of the letter is the Respondent, as it is the person in control of the disputed domain name and of any websites and email addresses set up with the disputed domain name. The name "King Husch & Blackwell LLP" is confusingly similar to the name of the Complainant and to its HUSCH BLACKWELL trademark, as it fully incorporates them, and the disputed domain name itself appears as a misspelling both of the name of that law firm and of the Complainant's trademark. These circumstances lead the Panel to the conclusion that the Respondent has registered the disputed domain name believing it to be confusingly similar to the Complainant's trademark, and with an intention to confuse Internet users that they are corresponding and interacting with the Complainant. These circumstances further support the finding that the disputed domain name is confusingly similar to the Complainant's HUSCH BLACKWELL trademark.

Considering all the above, 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 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 3.0](#), 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 name. 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 name such as those enumerated in the Policy or otherwise.

Panels have held that the use of a domain name for illegal activity (here, claimed phishing, passing off or other types of fraud) can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13.1.

The letter submitted as evidence by the Complainant invites its recipient to claim a life insurance policy worth more than USD 11 million of an unrelated deceased person with the same family name and nationality as the recipient of the letter. The letter also proposes to its recipient to share the received amount from the policy with the sender of the letter, and to provide his or her full name and contact telephone number in order to participate in the proposed scheme. The letter is sent by a person claiming to be an attorney at the law firm “King Husch & Blackwell LLP” and indicates in its letterhead a website and an email address at the disputed domain name. According to the Complainant, the law firm named in this letter does not exist and its address is fake.

The Panel understands this letter as a proposal for the joint carrying out of a scheme that appears to involve insurance fraud and/or money laundering. Even if there is no real money involved, the sender of the letter still attempts to collect personal data from individuals who would agree to participate in the proposed scheme.

The fact that the letter indicates contact details of the sender that include website and email addresses set up at the disputed domain name supports a conclusion that the letter must have been sent by the Respondent or with its consent. The name of the purported law firm (there is no evidence in the case file about its actual existence) is confusingly similar to the name of the Complainant, and the disputed domain name appears as a misspelling of both. This may confuse recipients of correspondence from the sender of this letter that they are receiving correspondence from the Complainant and make them more willing to interact and share their personal data with it.

The Respondent has not submitted a Response and has not disputed the above evidence or its involvement in it.

Taken together, all this supports a conclusion that the Respondent has registered and used the disputed domain name in an attempt to exploit the goodwill of the Complainant as part of a scheme for the carrying out of illegal activities, by misleading Internet users that they are interacting with the Complainant. Such conduct cannot support a finding of rights or legitimate interests in the disputed domain name.

The Panel therefore finds that 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 3.0](#), section 3.2.1.

Panels have held that the use of a domain name for illegal activity (here, claimed phishing, passing off, or other types of fraud) constitutes bad faith. [WIPO Overview 3.0](#), section 3.4. Having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain name constitutes bad faith under the Policy.

As already discussed in the previous sections of this decision, the evidence in the case supports a conclusion that by registering and using the disputed domain name, the Respondent has attempted to confuse and mislead Internet users that they are interacting with the Complainant as part of a scheme for the carrying out of illegal activities involving insurance fraud, money laundering, or phishing of personal data. Such actions may harm the Complainant's reputation and support a finding that the Respondent has registered and used the disputed domain name in bad faith.

The Panel therefore 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 name <kinhusblacwell.com> be transferred to the Complainant.

*/Assen Alexiev/*

**Assen Alexiev**

Sole Panelist

Date: August 19, 2025