

ADMINISTRATIVE PANEL DECISION

Veterinary Emergency Group, LLC, fka SCHF VEG, LLC v. Nagar Brar
Case No. D2025-2829

1. The Parties

The Complainant is Veterinary Emergency Group, LLC, United States of America ("United States"), represented by Shelly Paioff, United States.

The Respondent is Nagar Brar, United States, appearing pro se.

2. The Domain Name and Registrar

The disputed domain name <vee.vet> is registered with GoDaddy.com, LLC (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on July 17, 2025. On July 17, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On July 21, 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 ("Domains By Proxy, LLC") and contact information in the Complaint. The Center sent an email communication to the Complainant on July 22, 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 July 24, 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 25, 2025. In accordance with the Rules, paragraph 5, the due date for Response was August 14, 2025. The Response was filed with the Center on August 8, 2025.

The Center appointed David H. Bernstein 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.

On August 15, 2025, the Panel issued Procedural Order No. 1 pursuant to paragraphs 10 and 12 of the Rules inviting the Respondent to submit (1) a certification for his Response, as contemplated by paragraph 5(c)(viii) of the Rules, and (2) documentary or other evidence that substantiates the factual assertions in the Response, including but not limited to evidence predating notice of this dispute showing the Respondent's use, or demonstrable preparations to use, the disputed domain name in connection with a bona fide offering of goods or services. On August 21, 2025, the Center received the Respondent's submission. On August 26, 2025, the Complainant requested leave to file a reply to the Respondent's supplemental submission. On the same date, the Panel issued Procedural Order No. 2 inviting the Respondent to comment on the Complainant's submission. Although the Respondent objected by email communication of August 27, 2025, the Panel accepted the Complainant's supplemental submission because the Respondent's Response raised factual issues that the Complainant could not have anticipated in the Complaint.

4. Factual Background

The Complainant provides emergency veterinary services in 109 hospitals across the United States under the trademark VEG (which is an acronym for its name, Veterinary Emergency Group). The Complainant owns U.S. Trademark Registration No. 6,522,855 for the VEG mark, which it registered on October 19, 2021, in the U.S. Patent and Trademark Office ("USPTO"). According to its date of first use as claimed in its federal trademark registration, the Complainant has been operating its veterinary services under the VEG mark since August 7, 2018. The Complainant also owns the International Registration No. 1,736,074 for VEG, registered on May 24, 2023.

The Complainant's web site is located at "www.veg.vet". The Complainant registered the domain name <veg.vet> on July 20, 2016. The Complainant also owns the domain name <veg.com>, which it acquired on February 22, 2022. The Complainant's website's home page displays the Complainant's logo with the VEG mark and states, in part: "24-Hour Emergency Vet Hospital" and "Walk-in Treatment for Emergencies."

The Respondent, Nagar Brar, is a veterinarian employed at Gilmer Road Animal Hospital. The Respondent registered the disputed domain name on April 9, 2025. Until the filing of the Complaint, the disputed domain name resolved to a website that featured a background image of a veterinary professional caring for a dog, coupled with the prominent phrase "compassionate care for your pets." The Respondent registered the entity VETS UNLEASHED LLC on September 11, 2024. On August 20, 2025, during the pendency of this proceeding, VETS UNLEASHED LLC applied to adopt "VEE.VET" as an assumed name.

5. Parties' Contentions

A. Complainant

The Complainant contends that the disputed domain name should be transferred to the Complainant.

First, the Complainant contends that the disputed domain name is confusingly similar to the Complainant's trademark and corresponding domain name, VEG and <veg.vet>. In support, the Complainant argues that the disputed domain name differs from the Complainant's trademark by only a single letter, constituting a deliberate misspelling, known as typosquatting. The Complainant contends that the use of veterinary-specific content and

messaging, combined with the “.vet” generic Top-Level Domain (“gTLD”), exacerbates the potential for confusion. In its view, these elements combine to create the false impression that the disputed domain name is affiliated with, endorsed by, or otherwise connected to the Complainant and its VEG-branded services.

Second, the Complainant contends that the Respondent has no rights or legitimate interests in the disputed domain name. The Complainant argues the Respondent has not shown use or demonstrable preparations to use the disputed domain name in connection with a business. Specifically, the Complainant argues that the Respondent’s supplemental submissions—consisting of mockups of the proposed website and other undated materials—fail to establish demonstrable preparations. According to the Complainant, these materials were likely created after the initiation of this dispute; at the minimum, there is no evidence that the mockups were created prior to the initiation of the dispute. The Complainant further asserts that the Respondent has never been known by the name “VEE,” is not making a legitimate noncommercial or fair use of the disputed domain name, and that the landing page to which the disputed domain name resolved is a phishing attempt aimed at collecting personal information from misdirected users.

Finally, the Complainant contends that the disputed domain name has been registered and subsequently used in bad faith. The Complainant argues that it is inconceivable that the Respondent registered the disputed domain name without knowledge of the Complainant’s business due to the Complainant’s commercial use of its mark since 2016, the similarity between the names, the parties’ common use of the specialized “.vet” gTLD, and the geographic proximity of the Respondent’s veterinary practice to one of the Complainant’s hospitals. The Complainant contends that there is no plausible good faith reason for the registration of the disputed domain name and argues that the registration and use of the disputed domain name reflects a calculated effort to trade on the goodwill and reputation of the VEG mark.

B. Respondent

The Respondent contends that the Complainant has not satisfied all three of the elements required under the Policy for a transfer of the disputed domain name.

First, the Respondent contends that the disputed domain name is not confusingly similar to the Complainant’s trademark. The Respondent argues that the disputed domain name and the trademark are distinguishable based on the differences in the pronunciation and visual impact of “vee” and “veg,” and that confusion is further unlikely given the differences in the visual presentation of each website’s logo. The Respondent also contends that the disputed domain name and the trademark are being used to identify different services with different business models. Namely, the Complainant offers emergency veterinary services, while the Respondent alleges that he aims to use the disputed domain name <vee.vet> in connection with an employment platform for veterinarians. The Respondent argues that the parties are not targeting the same consumers because the Respondent’s business is not aimed at pets or their owners, and the Respondent does not operate veterinary hospitals. Rather, the Respondent’s business would be connecting veterinarians with employment opportunities at veterinary hospitals.

To substantiate his claim that he plans to offer different services and therefore that confusion is unlikely, the Respondent explained that the website landing page submitted by the Complainant as Annex 7, which created the appearance that the disputed domain name would be used to operate veterinary services, was not his planned website but rather was a placeholder landing page generated by GoDaddy (presumably because of the .vet gTLD). To substantiate this assertion, the Respondent submitted a mockup of the website he plans to use for his veterinary employment platform (as mentioned above, this mockup was undated). Additionally, the Respondent contends that the “.vet” gTLD does not create confusion. The Respondent argues that the “.vet” gTLD is merely an industry indicator that he is justified in using because he operates in the veterinary industry.

Second, the Respondent asserts that he has rights or legitimate interests in the disputed domain name because he is using the disputed domain name in connection with a distinct service platform that he is actively building. He refutes the Complainant's argument that he has not been "commonly known" as VEE on the ground that the argument is premature and speculative, because he is actively working to develop his business and brand. The Respondent argues that he is making a legitimate commercial use of the disputed domain name and is not using the website to which the disputed domain name resolves as a "phishing attempt".

Third, the Respondent asserts that the disputed domain name was registered and is being used in good faith, and contends that the Complainant's allegations of bad faith are unsupported and based on a mischaracterization of the Respondent's business. The Respondent submits that the registration and use of the disputed domain name were undertaken for legitimate commercial purposes. The Respondent alleges that he selected the word "vee" to invoke the sound of "bee" in order to align with the imagery of a bumble bee in his logo and because the word "vee" represents the first letter of "veterinarian." The Respondent denies any prior knowledge of the Complainant or its trademark at the time he registered the disputed domain name. The Respondent disputes the Complainant's claim that the disputed domain name was registered for the purpose of typosquatting. He asserts that his business model is focused on connecting veterinary professionals with clinics seeking staff—a legitimate commercial enterprise—and is not designed to divert or mislead Internet users. The Respondent maintains that there is a clear distinction between his services and those offered by the Complainant, both in content and target audience. The Respondent emphasizes that the combination of the term "vee," the ".vet" gTLD, and its branding (including a bee logo) all point to a distinct and legitimate business purpose. He contends that his planned landing page, viewed in context, clearly communicates this professional focus and does not attempt to trade on the Complainant's goodwill.

6. Discussion and Findings

Paragraph 4(a) of the Policy provides that the Complainant must prove each of the following three elements by a preponderance of the evidence to obtain an order that a disputed domain name be transferred:

- (1) the domain name registered by the respondent is identical or confusingly similar to a trademark or service mark in which the complainant has rights;
- (2) the respondent has no rights or legitimate interests in respect of the domain name; and
- (3) the domain name has been registered and is being used in bad faith.

For the reasons stated below, the Panel finds that the Complainant has not proven all three elements.

A. Identical or Confusingly Similar

The first element of the UDRP functions primarily as a standing requirement. The standing test of the first element requires the Complainant to show that it has rights in a trademark, and that the disputed domain name is identical or confusingly similar to that trademark. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition, (["WIPO Overview 3.0"](#)), section 1.7.

The Complainant has submitted evidence that it owns a federal registration for the VEG mark in the United States and as such has clearly established that it has rights in the VEG trademark. See [WIPO Overview 3.0](#), section 1.2.1 ("Where the complainant holds a nationally or regionally registered trademark or service mark, this prima facie satisfies the threshold requirement of having trademark rights for purposes of standing to file a UDRP case.").

The Complainant's trademark VEG and the second level of the Respondent's domain name VEE differ by only one letter (and both start with the same two letters – “ve”). That alone is enough to establish standing in this case as Complainant's VEG trademark is sufficiently recognizable within the disputed domain name and the overall impression of the two terms is not so different as to avoid a finding of confusingly similarity for purposes of the Policy.

The fact that the parties use the same gTLD (.vet) affirms the similarity between the disputed domain name and the trademark for purposes of the first element. Although the TLD is often disregarded when determining confusing similarity, where the TLD has some relevance to the Complainant's trademark or goods or services, the TLD may be considered as part of the broader case context and in particular under the second and third elements (as is also the case for terms added to the relevant mark). See section 1.7 of [WIPO Overview 3.0](#). The Panel finds that the first element of the Policy has been established.

B. Rights or Legitimate Interests

Under section 4(c) of the Policy, a respondent may have rights or legitimate interests in a domain name if:

- (i) before notice of the dispute over the domain name, the respondent has made “use of, or demonstrable preparations to use, the domain name or a name corresponding to the domain name in connection with a bona fide offering of goods or services”;
- (ii) the respondent has been “commonly known by the domain name”; or
- (iii) the respondent is “making a legitimate noncommercial or fair use of the domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue.

The Complainant puts forth evidence that the Respondent's landing page (Annex 7) appears to offer veterinarian services, in direct competition with Complainant. That evidence establishes a prima facie case that the Respondent may have been using or intending to use the disputed domain name in a way that could be trademark infringement, such that the Respondent lacked rights or legitimate interests in the disputed domain name. See, e.g., *Orient Express v. Nguyen Trong Hanh*, WIPO Case No. [D2025-2528](#).

The Respondent, though, has come forward with evidence to rebut that prima facie case. The Respondent has explained that the offending page was a generic landing page generated by GoDaddy, and that it did not reflect his planned use of the disputed domain name. Rather, the Respondent explained, he intends to provide different services, focused on veterinarian employment rather than animal care services.

The evidence that the Respondent has offered in support of this assertion is thin. Although the Respondent asserts that he intends to use the disputed domain name in this way, the mocked up website that the Respondent submitted, showing what a veterinarian employment website might look like is undated. Despite the Panel's invitation, the Respondent (who is appearing pro se) did not submit any documentary evidence to support his assertions that these materials predate the Complaint, and therefore establish demonstrable preparations prior to the filing of the Complaint.

Although it is a close call, the Panel finds that the Respondent's assertions are credible. Although the Respondent's arguments are not supported by dated documentary evidence, the Respondent has submitted a mockup that shows what its planned website will offer, and that offering is different from the veterinary services offered by the Complainant. Further, the Respondent has certified that the statements in its Response (including that this mockup reflects its planned business) is complete and accurate. The Panel also credits the Respondent's assertion that it selected the name “vee” for its domain name because that reflects the first letter of the word “veterinarian.”

The Panel therefore finds that the second element has not been established..

In making this finding (which is a close one given the Respondent's failure to submit more compelling documentary evidence), the Panel recognizes that the Complainant will be able to monitor the Respondent's plans. If the Respondent fails to launch its planned veterinarian employment website within a reasonable period, or instead launches a different website or business, this would undermine the credibility of the Respondent's assertions in this matter. In that case, the Complainant might have grounds to refile the Complaint. Further, if the Complainant doubts the veracity of the Respondent's certification, the Complainant could test the bona fide of the Respondent's assertions and evidence through discovery, which is not available in proceedings under the Policy.

C. Registered and Used in Bad Faith

Paragraph 4(b) of the Policy lists the following circumstances as examples of bad faith:

- “(i) circumstances indicating that you have registered or you have acquired the domain name primarily for the purpose of selling, renting, or otherwise transferring the domain name registration to the complainant who is the owner of the trademark or service mark . . . for valuable consideration in excess of your documented out-of-pocket costs directly related to the domain name; or
- (ii) you have registered the domain name in order to prevent the owner of the trademark or service mark from reflecting the mark in a corresponding domain name, provided that you have engaged in a pattern of such contact; or
- (iii) you have registered the domain name primarily for the purpose of disrupting the business of a competitor; or
- (iv) by using the domain name, you have intentionally attempted to attract, for commercial gain, Internet users to your web site or other on-line location, by creating a likelihood of confusion with the complainant's mark as to the source, sponsorship, affiliation, or endorsement of your web site or location or of a product or service on your web site or location.”

As noted above, the landing page submitted by the Complainant (Annex 7) displayed the phrase “Compassionate Care for your Pets” alongside an image of a veterinarian caring for a dog. If that was how the Respondent intended to use the disputed domain name, that might have supported a finding of bad faith, since such a website would appear to confuse consumers as to whether the Respondent was or was affiliated with the Complainant.

But, as the Respondent has explained, that page was a generic landing page generated by GoDaddy, and did not reflect how the Respondent intends to use the disputed domain name. Rather, the Respondent intends to use the disputed domain name for a different business, once that focuses on employment in the veterinary industry. That proposed use does not seem to the Panel to be designed to create a likelihood of confusion with the Complainant or its brand, business or website. Nor does it seem to be designed to disrupt the Complainant's business, or to prevent the Complainant from using a domain name corresponding to its trademark.

Moreover, the Panel is cognizant that three-letter domain names can be prized (albeit typically more so in “.com” than some newer gTLDs). And, although some three-letter trademarks may be quite famous (e.g., BMW, IBM, NBC, or NFL), the Complainant has not submitted any evidence that its VEG trademark falls into that category. In the absence of such evidence, and given the Respondent's credible argument that it selected the “vee” portion of the disputed domain name because it reflects the first letter of the word veterinarian, the Panel cannot find

that the Complainant has proven that the Respondent registered and used the disputed domain name in bad faith towards the Complainant and its VEG trademark.

The Panel therefore finds, on this thin and close record, that the Complainant has not established that the Respondent registered and used the disputed domain name in bad faith (however see above as to possible refiling scenarios).

7. Decision

For the foregoing reasons, the Complaint is denied.

/David H. Bernstein/

David H. Bernstein

Sole Panelist

Date: September 6, 2025