

ADMINISTRATIVE PANEL DECISION

Tottenham Hotspur Limited v. [Name Redacted] and Maurice Buckhanna Case No. D2025-2937

1. The Parties

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

The Respondents are [Name Redacted]¹ and Maurice Buckhanna, United States of America.

2. The Domain Names and Registrar

The disputed domain names <spurskit.com>, <spurskits.com> and <tottenhamhotspurstore.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 July 23, 2025. On July 24, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On July 27, 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 (Super Privacy Service Ltd, c/o Dynadot) and contact information in the Complaint.

The Center sent an email communication to the Complainant on July 28, 2025 with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrar(s), 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 August 1, 2025.

¹ The Respondent appears to have used the name of a third party when registering the disputed domain name. In light of the potential identity theft, the Panel has redacted the Respondent’s name from this decision. However, the Panel has attached as Annex 1 to this decision an instruction to the Registrar regarding transfer of the disputed domain name, which includes the name of the Respondent. The Panel has authorized the Center to transmit Annex 1 to the Registrar as part of the order in this proceeding and has indicated Annex 1 to this decision shall not be published due to the exceptional circumstances of this case. See *Banco Bradesco S.A. v. FAST 12785241 Attn. Bradescourgente.net / Name Redacted*, WIPO Case No. [D2009-1788](#).

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 Respondents of the Complaint, and the proceedings commenced on August 6, 2025. In accordance with the Rules, paragraph 5, the due date for Response was August 26, 2025. On August 9, 2025, a third party emailed the Center regarding the claimed unauthorized use of its identity in relation to the disputed domain name in the present proceedings. The Respondents did not submit any response.

The Center appointed Zoltán Takács as the sole panelist in this matter on September 10, 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 in this proceeding is a UK private limited company that operates one of the leading professional football clubs TOTTENHAM HOTSPUR founded in 1882.

The Complainant is the owner of a number of registered trademarks for TOTTENHAM HOTSPUR, SPURS (which the football club is commonly referred to) and a logo depicting a stylized cockerel standing on top of a soccer ball (“the Cockerel on the Ball” logo) including, by way of example:

- International Trademark Registration (IR) No. 1211256 for the mark TOTTENHAM HOTSPUR registered on March 28, 2013;
- UK Trademark Registration No. UK00912140547 for the mark SPURS registered on February 4, 2014; and
- IR No. 1211009 for the “Cockerel on the Ball” logo, registered on April 2, 2013.

The Complainant sells a range of official merchandise at its “shop.tottenhamhotspur.com” website (“Spurs Shop”). The corresponding domain name <tottenhamhotspur.com> was registered on December 17, 1999.

The disputed domain names <tottenhamhotspurstore.com> (registered on June 9, 2024) and <spurskit.com> (registered on January 2, 2025) have been redirecting to identical websites displaying the Complainant’s trademarks and imagery, including an identical logo used at the Complainant’s official online Spurs Shop and purport to sell “100% official merchandise” of the Complainant as well as football boots of various other brand owners.

The disputed domain name <spurskits.com>, which was registered on January 2, 2025 and used to redirect to the identically looking website as in case of the other two disputed domain names is currently inactive.

The websites at the disputed domain names at the end of each page all feature, or featured a copyright notice reading © Tottenham Hotspur.

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 that:

- the disputed domain names which incorporate its trademarks with the addition of the terms "kit", "kits" and "store" are confusingly similar to the trademarks;
- the Respondents have no rights or legitimate interests in respect of the disputed domain names since they are unable to rely on any of the circumstances set out in paragraphs 4(c)(i), (ii), or (iii) of the Policy;
- the Respondents' knowledge of the Complainant and its trademarks at registration of the disputed domain names and use of the disputed domain names to sell counterfeit merchandise of the Complainant is evidence of bad faith registration and use of the disputed domain names.

The Complainant requests that the disputed domain names be transferred from the Respondents to the Complainant.

B. Respondents

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

6. Discussion and Findings

A complainant must evidence each of the three elements required by paragraph 4(a) of the Policy in order to succeed on the complaint, namely that:

- (i) the domain names are identical or confusingly similar to a trademark or service mark in which the complainant has rights;
- (ii) the respondents have no rights or legitimate interests in respect of the domain names; and
- (iii) the domain names have been registered and are being used in bad faith.

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 of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 4.11.2.

As regards common control, the Panel notes that the identical content displayed on each website connected to the disputed domain names is compelling indication that the disputed domain names are under common control.

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 below 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 name. [WIPO Overview 3.0](#), section 1.7.

The disputed domain names contain the Complainant’s TOTTENHAM HOTSPUR and SPURS trademarks which are recognizable within the disputed domain names. The addition the terms “kit”, “kits” and “store” to the trademarks in the disputed domain names does not prevent a finding of confusing similarity between the disputed domain names and the trademarks for the purposes of the Policy. [WIPO Overview 3.0](#), sections 1.7 and 1.8.

The Panel finds that 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 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.

The Panel notes that it is evident that the Complainant has not authorized, licensed, or allowed the Respondent to use its trademarks in the disputed domain names.

According to the documentary evidence submitted by the Complainant, the disputed domain names redirect (or have redirected) to identical websites displaying the Complainant’s trademarks and imagery, including an identical logo used at the Complainant’s official online Spurs Shop purporting to sell “100% official merchandise” of the Complainant as well as football boots of various other brand owners.

The Panel notes that there is no evidence as to whether the goods offered on the Respondent's website at the disputed domain names are or were counterfeit or "genuine", or whether any of those goods ultimately exist or existed. However, even if the merchandise that appeared on the Respondent's website under the disputed domain names would have existed or were genuine, for the above-mentioned reasons the Respondent's websites would still not qualify as fair use. [WIPO Overview 3.0](#), section 2.8.1, and *Ok! Data Americas, Inc. v. ASD, Inc.*, WIPO Case No. [D2001-0903](#).

In view of the Panel the Respondent's use of the Complainant's trademarks and imagery on the websites at the disputed domain names and in particular the identical use of the Complainant's official online Spurs Shop logo and the false copyright notice makes it clear that the Respondent's intention was to impersonate the Complainant. UDRP panels have categorically held that the use of a domain name for illegal activity (in this case impersonation/passing off) can never confer rights of legitimate interest on a respondent. [WIPO Overview 3.0](#), section 2.13.1.

The Panel 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.

Having reviewed the record the Panel finds the Respondent's registration and use of the disputed domain names constitutes bad faith under the Policy.

In the present case, the Panel notes that the Complainant's trademarks are inherently distinctive and that their registration predates the date of registration of the disputed domain names.

The websites at the disputed domain names display the Complainant's trademarks and imagery and purport to sell official merchandise of the Complainant. Thus, in view of the Panel it is clear that the Respondent had actual knowledge of the Complainant and its trademarks and registered the disputed domain names to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant's trademarks. Paragraph 4(b)(iv) of the Policy.

The Respondent's intent to target the Complainant and its trademarks can be readily inferred from the contents of the Respondent's websites seeking to impersonate the Complainant by directing Internet traffic to its websites in order to gain illegitimate profit through impersonation or false association. Visitors of the Respondent's websites might have reasonably believed that they were connected to or approved by the Complainant as it appeared to offer merchandise under the Complainant's trademark, logo and imagery and gave the impression that the sites attached to the disputed domain names were official, while that was clearly not the case.

In addition, the individual confirmed by the Registrar as the registrant of the disputed domain name <tottenhamhotspurstore.com> explicitly stated to have nothing to do with registration and use of the subject domain name. It appears that the Respondent has stolen this individual's identity when registering the subject domain name, which is further evidence of bad faith. [WIPO Overview 3.0](#), section 3.4.

As mentioned above, the disputed domain name <spurskits.com> is currently inactive.

However, panels have found that the non-use of a domain name (including a blank or "coming soon" page) would not prevent a finding of bad faith under the doctrine of passive holding. [WIPO Overview 3.0](#), section 3.3. In this context, the Panel notes the reputation of the Complainants' trademarks, the composition and previous use of the disputed domain name and finds that in the circumstances of this case the current passive holding of the disputed domain name does not prevent a finding of bad faith under the Policy.

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 <spurskit.com>, <spurskits.com> and <tottenhamhotspurstore.com> be transferred to the Complainant.

/Zoltán Takács/

Zoltán Takács

Sole Panelist

Date: September 24, 2025