

ADMINISTRATIVE PANEL DECISION

Leatherman Tool Group, Inc. v. zhang qiang
Case No. D2025-3233

1. The Parties

The Complainant is Leatherman Tool Group, Inc., United States of America (the “United States”), represented by Safenames Ltd., United Kingdom.

The Respondent is zhang qiang, China.

2. The Domain Names and Registrar

The disputed domain names <leathermancanada.com>, <leathermancolombia.com>, <leathermancz.com>, <leathermandanmark.com>, <leathermankuwait.com>, <leathermannederland.com>, <leathermanportugal.com>, <leathermanromania.com>, <leathermansouthafrica.com>, <leathermansuomi.com>, <leathermansverige.com>, <leathermanuk.com>, and <leathermanuruguay.com> (the “Disputed Domain Names”) are registered with Paknic (Private) Limited (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on August 12, 2025. On August 13, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain Names. On August 14, 2025, the Registrar transmitted by email to the Center its verification response confirming that the Respondent is listed as the registrant and providing the contact details.

The Center verified that the 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 August 18, 2025. In accordance with the Rules, paragraph 5, the due date for Response was September 7, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on September 11, 2025.


The Center appointed Monica Novac as the sole panelist in this matter on September 17, 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 Leatherman Tool Group, Inc., a company founded in 1983 in the United States. The Complainant provides multi-purpose tools, wearables, knives, pocket tools and other related accessories. At present, the Complainant's products are sold in more than 70 countries around the world, including via the popular marketplace Amazon. The Complainant is active on social media platforms (i.e., X, Facebook, LinkedIn, Instagram, and YouTube), where it gathered thousands of followers. Further to the extensive exposure of its brand and products, the Complainant has obtained national and international recognition in the tool market.

The Complainant owns the following trademarks:

- United States Trademark Registration No. 1325473 LEATHERMAN (word) registered on March 19, 1985, for goods in class 8;
- United States Trademark Registration No. 2596689 LEATHERMAN (word) registered on July 23, 2002, for goods in class 25;
- Canada Trademark Registration No. TMA380140 LEATHERMAN (word) registered on February 15, 1991, for goods in class 8; and
- European Union Trademark Registration No. 000041731 LEATHERMAN (word) registered on March 31, 2004, for goods in classes 18, 25 and 28.

The Complainant uses the LEATHERMAN trademark as part of its brand logo, under the form  LEATHERMAN .

Furthermore, the Complainant owns the domain name <leatherman.com>, registered on October 19, 1995, which directs to the Complainant's official website. In July 2025, this website received an average of 1.2 million visits from users around the world, including from the United States, Canada, Germany, France, and the United Kingdom, which represents a traffic increase compared to the previous months of May and June 2025.

Besides the above, the Complainant also owns other domain names (e.g., <leatherman.ca>, <leatherman.be>, <leatherman.cn>, <leatherman.co.uk>, <leatherman.mx>), most of these redirecting to official websites operated by the Complainant.

The Respondent is zhang qiang, reportedly located in China. The Respondent registered the Disputed Domain Names <leathermancanada.com>, <leathermancolombia.com>, <leathermankuwait.com>, <leathermannederland.com>, <leathermansouthafrica.com>, <leathermansverige.com>, <leathermanuk.com>, and <leathermanuruguay.com> on December 21, 2023, while the rest of the Disputed Domain Names <leathermancz.com>, <leathermandanmark.com>, <leathermanportugal.com>, <leathermanromania.com>, and <leathermansuomi.com> were registered on December 25, 2023. All thirteen Disputed Domain Names are registered with the same Registrar.

According to the evidence filed by the Complainant, on the date of filing the Complaint, all thirteen Disputed Domain Names resolved to websites offering for sale goods (i.e., tools and apparel) under the Complainant's LEATHERMAN trademark at discounted prices. Said websites display the Complainant's LEATHERMAN logo and trademark, as well as copyrighted material taken from the Complainant's official website. The Complainant states that "the content appears for particular domain names only when accessed from the

respective country comprised in the Disputed Domain Names". The Complainant notes that four of the thirteen Disputed Domain Names (namely <leathermancanada.com>, <leathermancolombia.com>, <leathermansouthafrica.com>, and <leathermansverige.com>) resolve to parked websites when accessed from a different jurisdiction, in which pay-per-click ("PPC") links are also displayed.

At the time of rendering of this Decision, further to using a Spanish web browser, the Panel has been unable to access an active website at the Disputed Domain Names <leathermancanada.com>, <leathermancolombia.com>, <leathermancz.com>, <leathermandanmark.com>, <leathermankuwait.com>, <leathermannederland.com>, <leathermanromania.com>, <leathermansouthafrica.com>, <leathermansuomi.com>, <leathermansverige.com>, <leathermanuk.com>, and <leathermanuruguay.com>. The Panel notes that these Disputed Domain Names resolve to websites displaying the message "parked free, courtesy of GoDaddy.com".

As for the Disputed Domain Name <leathermanportugal.com>, when using a Spanish web browser, the Panel notes that this resolves to a website which offers for sale the same type of products as the Complainant (i.e., tools), as well as apparel, and which reproduces the Complainant's trademark and copyrighted materials.

On July 11, 2025, the Complainant's lawyers sent a cease-and-desist letter (via e-mail) to the Respondent, demanding, among others, the transfer of the Disputed Domain Names, however no reply was received.

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 are confusingly similar to the Complainant's LEATHERMAN trademark;
- the Respondent has no rights or legitimate interests in the Disputed Domain Names. The Complainant states that none of the scenarios provided under paragraph 4(c) of the Policy applies in this case; and
- the Disputed Domain Names were registered and are being used in bad faith.

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 Names. 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 a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The entirety of the LEATHERMAN trademark is reproduced within the Disputed Domain Names. The Panel finds that the LEATHERMAN trademark is recognizable within the Disputed Domain Names. Accordingly, the Disputed Domain Names are confusingly similar to the Complainant's trademark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

The Disputed Domain Names also contain the terms “canada”, “colombia”, “cz”, “danmark”, “kuwait”, “nederland”, “portugal”, “romania”, “southafrica”, “suomi”, “sverige”, “uk”, “uruguay”, respectively, however the Panel finds that the addition of these elements does not prevent finding a confusing similarity between the Disputed Domain Names and the Complainant's trademark for the purposes of the Policy. The Panel notes that the terms “canada”, “colombia”, “danmark”, “kuwait”, “nederland”, “portugal”, “romania”, “southafrica”, “suomi”, “sverige”, and “uruguay” represent the name of various countries expressed in the local languages or in English (respectively Canada, Colombia, Denmark, Kuwait, Netherlands (Kingdom of the), Portugal, Romania, South Africa, Finland, Sweden and Uruguay), while “cz” and “uk” are the common abbreviations for the Czech Republic and the United Kingdom. According to the [WIPO Overview 3.0](#), section 1.8, where the relevant trademark is recognizable within the disputed domain name, the addition of other terms (whether descriptive, geographical, pejorative, meaningless, or otherwise) would not prevent a finding of confusing similarity under the first element.

According to the [WIPO Overview 3.0](#), section 1.11.1, the addition of the generic Top-Level Domain “.com” in the Disputed Domain Names is viewed as a standard registration requirement and as such is disregarded under the first element confusing similarity test.

Further to 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 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 there is no evidence to show that the Respondent has trademark rights or unregistered rights over the term “leatherman” or any similar term.

It is accepted by the Panel that the Respondent is not related to the Complainant and that the Complainant has not licensed, nor consented to the Respondent's use of the LEATHERMAN trademark in any way. There is no evidence that the Respondent is commonly known by the Disputed Domain Names.

The Panel is of the opinion that the composition of the Disputed Domain Names suggests sponsorship or endorsement by the Complainant. [WIPO Overview 3.0](#), section 2.5.1.

The Panel notes that the Disputed Domain Names either resolve to parked websites or to websites displaying copyrighted material taken from the Complainant's official website, where tools and apparel are being marketed and sold at discounted prices under the Complainant's trademark, without any prominent disclaimer disclosing the lack of relationship between the Respondent and the Complainant.

The Respondent's use of the Disputed Domain Names as per the above does not represent a bona fide offering of goods or services, or a legitimate noncommercial or fair use, given the reputation and goodwill of the Complainant's mark or capacity to otherwise mislead Internet users. Moreover, the use of the Disputed Domain Names for illegal activity (e.g. impersonation/passing off), can never confer rights or legitimate interests on the Respondent. [WIPO Overview 3.0](#), section 2.13.1.

It is not clear from the Complainant's submission whether the goods marketed and sold on the websites at the Disputed Domain Names (when accessed from the respective country comprised in the Disputed Domain Names) are genuine or counterfeit. In case these are counterfeit, UDRP panels have held that the use of a domain name for illegal activity (e.g. the sale of counterfeit goods) can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13.1. Should these goods be genuine products, further to checking the only active website accessible to the Panel ("www.leathermanportugal.com"), the Panel finds that the use of the Complainant's trademark and copyrighted material, as well as the lack of any prominent disclaimer disclosing the lack of relationship between the Respondent and the Complainant, falsely suggest to Internet users that this website is owned by the Complainant or it is affiliated to the Complainant. [WIPO Overview 3.0](#), section 2.8. In case of this scenario and the Complainant's evidence that the websites at all thirteen Disputed Domain Names display similar content, the Panel concludes that the Disputed Domain Names are not being used in connection with a bona fide offering of goods or services.

The Respondent did not respond to the Complainant's contentions, thus the Respondent did not present any evidence for supporting any rights or legitimate interests in the Disputed Domain Names.

Further to all the above, 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 3.0](#), section 3.2.1.

In the present case, the Panel notes that the Respondent registered the Disputed Domain Names long after the Complainant registered and used its LEATHERMAN trademark. In view of the reputation of the Complainant, as well as the recognition of its LEATHERMAN trademark and the composition of the Disputed Domain Names, it is unlikely that the Respondent was not aware of the Complainant's trademark and business when registering the Disputed Domain Names. In view of the above, the Panel considers that the Respondent targeted the Complainant when registering the Disputed Domain Names.

Each of the Disputed Domain Names consists of the Complainant's LEATHERMAN trademark, plus the name of a country expressed in the local language or in English, respectively, or a common abbreviation of a country's name. Said composition of the Disputed Domain Names indicates the Respondent's intent to mislead the Internet users into believing that the Disputed Domain Names refer to the Complainant's official presence in a particular geographical region, and that the associated websites are affiliated with or endorsed by the Complainant, which supports a finding of the Respondent's bad faith.

The Disputed Domain Names either resolve to parked websites or to websites impersonating the Complainant, reproducing the Complainant's logo, trademark, and copyrighted material taken from the Complainant's official website, and collecting sensitive information about Internet users.

The Panel notes that when accessed from outside the country comprised in the Disputed Domain Names, the Internet users are directed to parked websites with unrelated or competing links. UDRP panels have found bad faith in similar cases, stating that domain name registrants are responsible for the content of websites associated with their domain names. [WIPO Overview 3.0](#), section 3.5.

On the other hand, the Panel notes that when accessed from the country comprised therein, the Disputed Domain Names direct to websites which offer for sale tools and apparel under the Complainant's trademark at discounted prices, by also displaying copyrighted material taken from the Complainant's official website, without any disclaimer disclosing the lack of relationship between the Respondent and the Complainant. Further to the above, and also in view of the composition of the Disputed Domain Names, the Panel is of the opinion that the Respondent intentionally attempted to attract, for commercial gain, Internet users to its websites by creating a likelihood of confusion with the Complainant and its trademark. [WIPO Overview 3.0](#), section 3.1.4.

Furthermore, the Panel considers that there is sufficient evidence to make a determination based on paragraph 4(b)(ii) of the Policy, which provides that bad faith registration and use will be found where the Respondent has "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 [the Respondent has] [...] engaged in a pattern of such conduct". UDRP panels have held that establishing a pattern of bad faith conduct requires more than one, but as few as two instances of abusive domain name registration. This may include a scenario where a respondent, on separate occasions, has registered trademark-abusive domain names, even where directed at the same brand owner. [WIPO Overview 3.0](#), section 3.1.2. In this case, the fact that the Respondent registered, on two separate occasions, the 13 Disputed Domain Names comprising the Complainant's LEATHERMAN trademark represents, in the Panel's opinion, a pattern of conduct directed against the Complainant, stopping it from reflecting its trademark in the Disputed Domain Names.

The Panel also notes the Respondent's failure to reply to the cease-and-desist letter sent by the Complainant's lawyers on July 11, 2025, which may be considered as a further indication of the Respondent's 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.

Further to all the above, 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 <leathermancanada.com>, <leathermancolombia.com>, <leathermancz.com>, <leathermandanmark.com>, <leathermankuwait.com>, <leathermannederland.com>, <leathermanportugal.com>, <leathermanromania.com>, <leathermansouthafrica.com>, <leathermansuomi.com>, <leathermansverige.com>, <leathermanuk.com>, and <leathermanuruguay.com> be transferred to the Complainant.

/Monica Novac/

Monica Novac

Sole Panelist

Date: October 1, 2025