

ADMINISTRATIVE PANEL DECISION

Salt & Stone Inc. v. 魏建东

Case No. D2025-3881

1. The Parties

The Complainant is Salt & Stone Inc., United States of America (“United States” or “U.S.”), represented by Thorpe North & Western LLP, United States.

The Respondent is 魏建东, China.

2. The Domain Name and Registrar

The disputed domain name <saltadnstone.com> is registered with Jiangsu Bangning Science & Technology Co. Ltd. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on September 24, 2025. On September 24, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On September 25, 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 sent an email communication to the Complainant on September 29, 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 amendment to the Complaint on September 30, 2025.

The Center verified that the Complaint together with the amendment to 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 October 6, 2025. In accordance with the Rules, paragraph 5, the due date for Response was October 26, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on October 29, 2025.

The Center appointed Gonalo M. C. Da Cunha Ferreira as the sole panelist in this matter on November 4, 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 U.S. company engaged in the manufacture and marketing of personal care products, including sunscreens, creams, body lotions, face oils, soaps, deodorants, and related cosmetics. As part of its marketing and promotional efforts, it has used the trademark SALT & STONE extensively in commerce since at least 2017.

The Complainant relies on several United States federal trademark registrations for SALT & STONE, including, in particular:

- United States Trademark Registration No. 5,188,252 for SALT & STONE, registered on April 18, 2017, in Class 3;
- United States Trademark Registration No. 5,826,235 for SALT & STONE, registered on August 6, 2019, in Class 3;
- United States Trademark Registration No. 7,651,475 for SALT & STONE, registered on January 14, 2025, in Class 3.

The Complainant also submits evidence of extensive use of the SALT & STONE mark in connection with its products, advertising investments, sales figures, and international presence, and contends that the mark enjoys substantial goodwill and reputation in the market.

The Complainant operates its website at the domain name <saltandstone.com>.

The disputed domain name <saltadnstone.com> was registered in May 2025. According to the evidence submitted, the disputed domain name resolves to a website that prominently uses the SALT & STONE designation, reproduces the Complainant's logo and product images, and closely mimics the Complainant's official website structure, including sections such as "Best Sellers" and "Shop by Category". The website purports to offer SALT & STONE-branded products with discounts.

The Respondent is located in Fujian Province, China. The record contains no evidence of any relationship between the Complainant and the Respondent, nor of any authorization, license or consent given by the Complainant to the Respondent to use the SALT & STONE mark in any manner.

The Respondent has been involved in multiple UDRP proceedings since 2024, including four cases brought by a third party, and a previous case brought by the present Complainant, *Salt & Stone, Inc. v. Wei Jian Dong* (魏建东), WIPO Case No. [D2025-2603](#), relating to the domain name <saltandtsone.com>. In that prior case, the panel found that a similarly-structured typosquatting domain name and a website mimicking the Complainant's official site had been registered and used in bad faith and ordered the transfer of the domain name to the Complainant.

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.

Notably, the Complainant contends that:

1. it manufactures and sells personal care products and has continuously used the SALT & STONE trademark in commerce since at least 2017 in connection with a broad range of cosmetic and body-care goods.
2. the disputed domain name <saltadnstone.com> incorporates the SALT & STONE mark almost entirely, differing only by the transposition of the letters “n” and “d”, which it characterizes as deliberate typosquatting.
3. the website at the disputed domain name reproduces the Complainant’s logo, product imagery, and overall website layout, misleading consumers into believing that the site is operated or endorsed by the Complainant.
4. the Respondent has no authorization or licence to use the SALT & STONE mark, is not commonly known by the disputed domain name, and possesses no rights or legitimate interests under paragraph 4(c) of the Policy.
5. the Respondent’s use of the disputed domain name seeks to trade on the Complainant’s goodwill and cannot constitute a bona fide offering of goods or services or legitimate noncommercial use.
6. the Respondent registered the disputed domain name in May 2025, long after the Complainant’s trademark rights arose, demonstrating knowledge of and targeting of the SALT & STONE mark.
7. the Respondent has been involved in multiple prior UDRP cases, including a previous complaint by the present Complainant concerning <saltandtstone.com>, evidencing a pattern of abusive conduct.
8. the Respondent previously engaged in repeated takedown-evasion “IP hopping” to continue operating infringing websites, further demonstrating 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 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 a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The disputed domain name <saltadnstone.com> incorporates the Complainant’s SALT & STONE mark (where “&” means “and”) in recognizable form, with only a transposition of the letters “n” and “d” in the word “and”. Such minor misspellings are a classic example of typosquatting and do not prevent a finding that the mark is recognizable in the disputed domain name.

The Panel finds the mark is recognizable within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7. and 1.9

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.

The Respondent’s use of a confusingly similar disputed domain name to host a website that imitates the Complainant’s official site and appears designed to mislead consumers cannot confer rights or legitimate interests. Panels have held that the use of a domain name for illegitimate or fraudulent activity, including impersonation or passing off, can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13.1.

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.

Under paragraph 4(b)(iv), it shall be evidence of registration and use in bad faith if, by using the domain name, the respondent has intentionally attempted to attract, for commercial gain, Internet users to its website or other online location by creating a likelihood of confusion with the complainant’s mark as to the source, sponsorship, affiliation, or endorsement of the respondent’s website or of products or services on it.

In the present case, the Panel notes that the Respondent registered and is using the disputed domain name with the intention of creating a likelihood of confusion with the Complainant’s SALT & STONE mark and of misleading Internet users for commercial gain. This falls squarely within paragraph 4(b)(iv) of the Policy.

The Panel also notes that the Respondent has been involved in a pattern of similar conduct, including prior UDRP cases brought by a third party, and in particular *Salt & Stone, Inc. v. Wei Jian Dong* (魏建东), WIPO Case No. [D2025-2603](#), where the Respondent registered another typo-variant of the Complainant’s mark and used it for a website mimicking the Complainant’s official store. Such a pattern of targeting well-known marks reinforces the finding of bad faith. [WIPO Overview 3.0](#), section 3.1.2.

Panels have found that bad faith may be inferred where a domain name is so obviously connected with a complainant’s mark that its very use by a party with no connection to the mark suggests opportunistic bad faith, see *Veuve Clicquot Ponsardin, Maison Fondée en 1772 v. The Polygenix Group Co.*, WIPO Case No. [D2000-0163](#). The same reasoning applies here.

Having regard to all of the above, the Panel finds that the disputed domain name has been registered and is being used in bad faith within the meaning of paragraph 4(a)(iii) of 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 name <saltadnstone.com> be transferred to the Complainant.

/Gonçalo M. C. Da Cunha Ferreira/

Gonçalo M. C. Da Cunha Ferreira

Sole Panelist

Date: November 18, 2025