

## ADMINISTRATIVE PANEL DECISION

Portland Leather Goods, Inc. v. blus, blus  
Case No. D2025-5029

### 1. The Parties

The Complainant is Portland Leather Goods, Inc., United States of America (“United States”), represented by Sheppard, Mullin, Richter & Hampton, LLP, United States.

The Respondent is blus, blus, Afghanistan.

### 2. The Domain Name and Registrar

The disputed domain name <portlandleathergoods.com> is registered with Dominet (HK) Limited (the “Registrar”).

### 3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on December 4, 2025. On December 4, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On December 5, 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 (Unknown) and contact information in the Complaint. The Center sent an email communication to the Complainant on December 5, 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 December 5, 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 December 10, 2025. In accordance with the Rules, paragraph 5, the due date for Response was December 30, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on January 7, 2026.

The Center appointed Jon Lang as the sole panelist in this matter on January 12, 2026. 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 was founded in 2017 as Portland Leather LLC, a purveyor of high-quality leather goods. It changed its name to Portland Leather, Inc., in December 2023, and on June 5, 2024, it became Portland Leather Goods, Inc. The Complainant has continuously and exclusively used the name Portland Leather as a trademark to advertise its leather goods since it began preparing to do business in 2016. The Complainant is the owner (by virtue of assignments) of the following United States Federal Trademark Registrations: PORTLAND LEATHER GOODS (Registration Number 6,693,622 with a registration date of April 5, 2022), and PORTLAND LEATHER (Registration Number 6,855,612 with a registration date of September 27, 2022, (together the "PORTLAND LEATHER Marks"). The Complainant has extensively advertised and promoted the PORTLAND LEATHER Marks. The Complainant currently has three bricks and mortar store locations in Oregon and Texas, United States, in addition to its website at "www.portlandleathergoods.com" which it has operated continuously since 2015, and which serves as the primary online presence for the Complainant and incorporates the PORTLAND LEATHER Marks.

The domain name in dispute <portlandleathergoods.com> ("the Domain Name") was registered on October 31, 2025, and resolves to a website which prominently displays the Complainant's PORTLAND LEATHER Marks, uses the Complainant's images, and advertises and sells leather goods purporting to originate from the Complainant.

On November 24, 2025, counsel for the Complainant submitted an online complaint to the Respondent using the Registrar's only method of communicating with the Respondent. No response was received. Counsel also sent the Domain Name Registrar a letter notifying it of the alleged impersonation, which was acknowledged. An online takedown request to the Domain Name web host was also submitted in November 2025.

#### **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 Domain Name.

The following is a summary of its key assertions:

##### **Rights and Confusing similarity**

The Complainant has become well known for providing simply designed, high quality leather goods at reasonable prices. As a result of the care and skill exercised by the Complainant in crafting a high-quality product, and because of extensive advertising, sales and public recognition of the PORTLAND LEATHER Marks and goods provided in connection therewith, the PORTLAND LEATHER Marks have become well-known throughout the United States and internationally.

The Domain Name is nearly identical and is confusingly similar to the PORTLAND LEATHER GOODS trademark – it is comprised entirely of a misspelling of the mark in that it adds an additional letter “l” to the word “leather” (and contains the generic Top-Level Domain (“gTLD”) indicator “.com”).

#### **Absence of Rights or legitimate interests**

The Respondent is not a representative of the Complainant, it does not have a license to use the PORTLAND LEATHER Marks and it is not authorized by the Complainant to register any domain name incorporating the PORTLAND LEATHER GOODS trademark. The Complainant is not aware of any evidence demonstrating that the Respondent is commonly known by the Domain Name. The Complainant does not believe that the Respondent has used or made demonstrable preparations to use the Domain Name in connection with a bona fide offering of goods or services, but appears to be using the Domain Name to impersonate the Complainant for the purposes of purporting to sell leather goods that originate from the Complainant when they do not. The Respondent appears to have directly copied content from the Complainant. For instance, the Respondent's website prominently features the name “Portland Leather” in black block font which is identical to the Complainant's own trademark stylization; the Respondent's “Our Story” website page is identical to that of the Complainant's; and the Respondent's “Careers” page features identical images and wording to that of the Complainant's “Careers” page.

The Respondent's website also advertises products using images taken from the Complainant's website.

The Respondent's confusingly similar Domain Name and associated copycat website create the false impression that the Respondent is the Complainant or is associated with the Complainant.

The Respondent has not made a legitimate noncommercial or fair use of the Domain Name.

#### **Bad faith**

The Domain Name has been used to impersonate the Complainant and to this end the Respondent used the Complainant's trademarks, logos, website images and product listing photos. The website to which the Domain Name pointed was configured by the Respondent to pass its business off as that of the Complainant, or as a website sponsored or endorsed by the Complainant, prominently displaying the Complainant's PORTLAND LEATHER Marks, product listing images and other content from the Complainant's website.

Given the Respondent's apparent actual knowledge of the Complainant (based on its copycat website), the Respondent's lack of legitimate interest in the PORTLAND LEATHER Marks, the fact that the Respondent used the Domain Name to impersonate the Complainant, and that it used the Complainant's trademarks and product listing photos to advertise and sell products purporting to originate from the Complainant when they do not, it is evident that the Respondent registered the Domain Name with the intention of attracting, for commercial gain, Internet users by using the Complainant's registered trademarks and website content to create a likelihood of confusion with the Complainant and the Complainant's PORTLAND LEATHER Marks. Such conduct constitutes bad faith registration and use.

#### **B. Respondent**

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

## 6. Discussion and Findings

Paragraph 4(a) of the Policy requires a complainant to prove: (i) that a respondent has registered a domain name which is identical or confusingly similar to a trademark or service mark in which a complainant has rights; (ii) that the respondent has no rights or legitimate interests in respect of the domain name; and (iii) that the domain name has been registered and is being used in bad faith. A complainant must prove each of these three elements to succeed.

### 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 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 both the PORTLAND LEATHER GOODS and PORTLAND LEATHER trademarks for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1. Both trademarks are recognizable within the Domain Name (<portlandleathergoods.com>). So far as the PORTLAND LEATHER GOODS trademark is concerned, the inclusion of an additional letter "l" before (or after, for that matter) the first letter of the word "leather" (to create a double "ll") does not prevent a finding of confusing similarity with the PORTLAND LEATHER GOODS trademark. Indeed, section 1.9 of [WIPO Overview 3.0](#) states that "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".

As for the PORTLAND LEATHER trademark, the addition in the Domain Name of not just the second "l" but also the word "goods", again does not prevent a finding of confusing similarity in that the Domain Name contains the trademark which is clearly recognizable (despite the misspelt word, "leather") and as section 1.8 of [WIPO Overview 3.0](#) states, "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".

For the purposes of comparison, the gTLD ".com" may be ignored.

The Panel finds that the Domain Name is confusingly similar to the PORTLAND LEATHER Marks for the purposes of the Policy and thus paragraph 4(a)(i) of the Policy (the first element) 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.

A respondent can show it has rights to or legitimate interests in a domain name in various ways even where, as is the case here, it is not licensed by or, by agreement or otherwise, legitimately affiliated with a complainant.

For instance, a respondent can show that it has been commonly known by the domain name or that it 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. A respondent can also show that it is using a domain name in connection with a bona fide offering of goods or services.

There is no evidence to indicate that the Respondent is commonly known by the Domain Name. The Domain Name was designed to be seen as incorporating the PORTLAND LEATHER Marks and as belonging to the Complainant or genuinely associated in some way with the Complainant. Given that the very purpose of the Domain Name is very likely to have been to deceive Internet users who may be looking for the Complainant or its genuine goods, no doubt for the purpose of financial gain (given the nature of the website to which the Domain Name resolves), and the serious risk (in any event) that Internet users will in fact be deceived, it cannot be said that there is legitimate noncommercial or fair use without intent for commercial gain to mislead, or a bona fide offering of goods or services.

As far as the PORTLAND LEATHER GOODS trademark is concerned, the Domain Name appears to be a clear case of typosquatting – the trademark has been included in its entirety and is identical to the Domain Name, save for what must be a deliberate, albeit minor, misspelling. Section 1.9 of the [WIPO Overview 3.0](#) makes clear that 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 (typically corroborated by infringing website content) to confuse users seeking or expecting the complainant”. As for the PORTLAND LEATHER trademark, whilst not identical to the Domain Name, it has been incorporated in its entirety (subject to the misspelling) but with the additional word “goods”. This far from distinguishes the Domain Name from the trademark or leads to any different analysis.

The Respondent has not come forward with a Response or engaged in any other way with this UDRP proceeding.

In all the circumstances, there is nothing to indicate that the Respondent has rights or legitimate interests in the Domain Name. The Complainant’s *prima facie* case has been made out but not answered or rebutted by the Respondent and accordingly, the Panel finds that the Complainant has fulfilled the requirements of paragraph 4(a)(ii) of the Policy (the second element).

### **C. Registered and Used 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 too 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.

The Respondent was obviously aware of the Complainant and its PORTLAND LEATHER Marks at the time of registration of the Domain Name given its formulation and the use to which it has been put.

One way a complainant may demonstrate bad faith registration and use is to show that a respondent has intentionally attempted to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with a complainant’s mark as to the source, sponsorship, affiliation or endorsement of its website or of products or services on it.

[WIPO Overview 3.0](#), section 3.1.4, in answer to the question, “How does a complainant prove that a respondent has intentionally attempted to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the complainant’s mark?” states: “Panels have consistently found that the mere registration of a domain name that is identical or confusingly similar (particularly domain names comprising typos or incorporating the mark plus a descriptive term) to a famous or widely-known trademark by an unaffiliated entity can by itself create a presumption of bad faith.” Here, the Respondent has gone far beyond mere registration; the Domain

Name resolves to a copycat website which impersonates the Complainant and advertises and sells leather goods purporting to originate from the Complainant. It is clear that the Respondent has intentionally attempted to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant's PORTLAND LEATHER Marks as to the source, sponsorship, affiliation or endorsement of its website or of products or services on it. Given this finding, there is little purpose in exploring other grounds on which a bad faith finding could be made.

The Panel finds that in the circumstances there is evidence of both registration and use of the Domain Name in bad faith (the third element).

## **7. Decision**

For all the foregoing reasons, in accordance with paragraphs 4(i) of the Policy and 15 of the Rules, the Panel orders that the Domain Name <portlandleathergoods.com> be transferred to the Complainant.

*/Jon Lang/*  
**Jon Lang**  
Sole Panelist  
Date: January 26, 2026