

ADMINISTRATIVE PANEL DECISION

Tommy Hilfiger Licensing LLC v. put udomdet
Case No. D2026-2029

1. The Parties

The Complainant is Tommy Hilfiger Licensing LLC, United States of America (“United States”), represented by Lipkus Law LLP, Canada.

The Respondent is put udomdet, Thailand.

2. The Domain Name and Registrar

The disputed domain name <tommyhilfigeroutlet.net> is registered with DropCatch.com LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on May 12, 2026. On May 12, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On May 12, 2026, 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 (Redacted for Privacy) and contact information in the Complaint. The Center sent an email communication to the Complainant on May 15, 2026, 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 May 19, 2026.

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 May 21, 2026. In accordance with the Rules, paragraph 5, the due date for Response was June 10, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on June 12, 2026.

The Center appointed Anna Carabelli as the sole panelist in this matter on June 16, 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

According to the information and supporting documents provided with the Complaint, the Complainant was founded in 1985 and is a global corporation that designs, sources, distributes, sells and markets fashion apparel, accessories and other products under the brand TOMMY HILFIGER.

The Complainant is the owner of several trademark registrations for TOMMY HILFIGER in various jurisdictions, including the following:

- United States TOMMY HILFIGER trademark registration No. 1398612, registered on June 24, 1986;
- Canadian TOMMY HILFIGER trademark registration No. TMA446291, registered on August 18, 1995; and
- European Union TOMMY HILFIGER trademark registration No. 018597898, registered on June 30, 2022.

The Complainant also owns domain names reflecting the trademark TOMMY HILFIGER, including <tommyhilfiger.com> which redirects to the Complainant's website.

The disputed domain name was registered on August 27, 2019, and resolves to a website prominently featuring the Complainant's TOMMY HILFIGER trademark. Although a check out option is currently unavailable, the website is purportedly offering TOMMY HILFIGER branded products for sale, and displays a text in Thai that, when translated into English, reads "If you're looking for classic, timeless clothing that's high-quality and affordable, Tommy Hilfiger Outlet is the perfect choice. This website offers a wide variety of clothing for men, women, and children, ensuring a convenient shopping experience and exclusive discounts you won't find anywhere else. Tommy Hilfiger Outlet is a globally recognized brand, loved around the world for its distinctive design, which harmoniously blends classic American style with modern touches. With its iconic red, white, and blue logo, Tommy Hilfiger clothing is more than just an item of clothing—it's a symbol of good taste and unmistakable style".

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:

- the Complainant's TOMMY HILFIGER trademark is well-known globally in the fashion industry;
- the disputed domain name is confusingly similar to the Complainant's trademark, since it incorporates the entire TOMMY HILFIGER mark, with the addition of the descriptive term "outlet";
- the Respondent has no rights or legitimate interests in the disputed domain name. In this regard the Complainant contends that: (i) the Complainant has not authorized or somehow given consent to the Respondent to register and use the disputed domain name; (ii) the Respondent is not commonly known by the disputed domain name; and (iii) the Respondent's use of the disputed domain name is neither a bona fide offering of goods or services nor a legitimate noncommercial or fair use, as it does not make clear that it has no official affiliation with the Complainant but rather emphasizes the affiliation with the Complainant and misleadingly diverts consumers;

- the disputed domain name was registered and is being used in bad faith. The Respondent was aware of the Complainant's trademark and purposefully selected the disputed domain name containing the entirety of the Complainant's TOMMY HILFIGER mark, in an effort to divert the Complainant's customers to the Respondent's website. By using the disputed domain name, the Respondent has intentionally attempted to attract for commercial gain Internet users by creating a likelihood of confusion with the TOMMY HILFIGER trademark;
- The Complainant further contends that a Reverse Whois search revealed that approximately 158 domain names were registered by or in association with "put udomdet", while 304 domain names were registered in association with the Respondent, corresponding to the Respondent's name and email address. Similarly to the disputed domain name, these domain names (several of which incorporate well-known apparel brand names) seemingly use a mark in its entirety with an added term that references services or products offered by the trademark holder, such as "outlet" and "store".

This demonstrates a pattern of abusive registrations by the Respondent, which prevents a trademark holder from using its mark in a domain name.

Based on the above the Complainant requests the disputed domain name be transferred to the Complainant.

B. Respondent

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

6. Discussion and Findings

Paragraph 15(a) of the Rules instructs the Panel to decide the Complaint based on the statements and documents submitted and in accordance with the Policy, the Rules and any rules and principles of law that it deems applicable.

Under paragraph 4(a) of the Policy, the Complainant must prove each of the following:

- (i) the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights;
- (ii) the Respondent has no rights or legitimate interests in respect of the disputed domain name; and
- (iii) the disputed domain name has been registered and is being used in bad faith.

Paragraph 4(b) of the Policy sets out four illustrative circumstances, which for the purposes of paragraph 4(a)(iii) of the Policy, shall be evidence of registration and use of a domain name in bad faith.

Paragraph 4(c) of the Policy sets out three illustrative circumstances any one of which, if found by the Panel, shall be evidence of the Respondent's rights to or legitimate interests in a disputed domain name for the purposes of paragraph 4(a)(ii) of the Policy above.

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 Select UDRP Questions ("[WIPO Overview 3.1](#)"), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The entirety of the mark is reproduced within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

The addition of the generic Top-Level Domain, such as “.net”, is viewed as a standard registration requirement and as such is typically disregarded under the first element confusing similarity test. [WIPO Overview 3.1](#), section 1.11.1.

Although the addition of other terms, here “outlet”, may bear on assessment of the second and third elements, the Panel finds the addition of such term does not prevent a finding of confusing similarity between the disputed domain name and the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.8.

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 that 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 3.1](#), 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.

Moreover, the Respondent has used the disputed domain name to operate a website which displays the Complainant’s TOMMY HILFIGER mark and offers allegedly TOMMY HILFIGER branded products. There is not any disclaimer on the website disclosing the (lack of) relationship between the Parties. Further to the so-called “Okidata test” enshrined in *Okidata Americas, Inc. v. ASD, Inc.*, WIPO Case No. [D2001-0903](#), this cannot constitute fair use.

Where a domain name consists of a trademark plus an additional term (here “outlet”), UDRP panels have largely held that such composition cannot constitute fair use if it effectively impersonates or suggests sponsorship or endorsement by the trademark owner. [WIPO Overview 3.1](#), section 2.5.1.

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.

In the present case, given the well-established reputation of the Complainant’s TOMMY HILFIGER trademark (also recognized in previous UDRP decisions including, *Tommy Hilfiger Licensing, LLC; Deckers Outdoor Corporation; Otter Products LLC v. 曾燕 (Zeng Yan); 赵兴明 (Zhao Xing Ming)*, WIPO Case No. [D2017-2384](#); and *Tommy Hilfiger Licensing LLC v. Chen Chen*, WIPO Case No. [D2024-0572](#)) it is not conceivable that the Respondent did not have in mind the Complainant’s trademark when registering the

disputed domain name. The content of the Respondent's website -which displays the Complainant's trademark and purports to offer TOMMY HILFIGER branded apparels– confirms that the Respondent actually knew and targeted the Complainant.

Even though there is currently no active checkout option—which could still be activated at any time— by directing the disputed domain name to a commercial website allegedly offering the Complainant's goods, 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 mark as to the source, sponsorship, affiliation, or endorsement of its website or of the products on its website. [WIPO Overview 3.1](#), section 3.1.3.

Under paragraph 4(b)(iv) of the Policy, this circumstance shall be evidence of the registration and use of a domain name in bad faith.

In addition, the Respondent's pattern of conduct of registering domain names reflecting third parties' trademarks as evidenced by a Reverse Whois lookup submitted in the Complaint, further justifies a finding a bad faith registration and use. [WIPO Overview 3.1](#), section 3.1.2

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 <tommyhilfigeroutlet.net> be transferred to the Complainant.

/Anna Carabelli/

Anna Carabelli

Sole Panelist

Date: June 30, 2026