

ADMINISTRATIVE PANEL DECISION

Little Seed Farm LLC v. huapusjmn huapusjmn
Case No. D2026-2312

1. The Parties

The Complainant is Little Seed Farm LLC, United States of America (“United States”), represented by Bass, Berry & Sims PLC, United States

The Respondent is huapusjmn huapusjmn, United States.

2. The Domain Name and Registrar

The disputed domain name <littleseedskin.shop> is registered with Spaceship, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on May 28, 2026. On May 29, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On May 29, 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 (“Unknown Registrant”) and contact information in the Complaint. The Center sent an email communication to the Complainant on June 1, 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 June 5, 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 June 9, 2026. In accordance with the Rules, paragraph 5, the due date for Response was June 29, 2026. The Respondent did not submit a response. The Center then notified the Respondent’s default on June 30, 2026.

The Center appointed Joseph Simone as the sole panelist in this matter on July 3, 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, Little Seed Farm LLC, is a United States-based company that produces organic soap and skincare products with ingredients sourced from its family farm. The Complainant has made use of, and invested in, its LITTLE SEED FARM marks throughout the United States since at least June 1, 2011.

The Complainant holds a portfolio of trademark registrations for its LITTLE SEED FARM marks, including United States Trademark Registration No. 5654367 for LITTLE SEED FARM in Class 3, registered on January 15, 2019.

The Complainant has since April 29, 2011, owned its registration for the domain name <littleseedfarm.com>, under which it maintains its primary website offering the above products.

The disputed domain name was registered on March 5, 2026. The Complainant has submitted evidence demonstrating that the disputed domain name has been used in connection with a website that purports to be the Complainant's online store and that advertises and sells skincare products under the LITTLE SEED FARM brand. At the time of this Decision, the disputed domain name resolves to an error page.

5. Parties' Contentions

A. Complainant

The Complainant contends that it has satisfied each of the three elements required under the Policy for a transfer of the disputed domain name.

Notably, the Complainant contends that the disputed domain name registered by the Respondent is confusingly similar to the Complainant's LITTLE SEED FARM marks, as it incorporates the distinctive "little seed" element of those marks.

The Complainant asserts that the Respondent has no rights or legitimate interests in the disputed domain name, as the Complainant has never authorized or licensed the Respondent to use the LITTLE SEED FARM marks in any manner and no relationship exists between the Parties. The Complainant also asserts that the Respondent has appropriated the disputed domain name to mislead consumers searching for the Complainant's products and to trade off the goodwill and reputation associated with the LITTLE SEED FARM marks.

The Complainant further contends that the Respondent registered and is using the disputed domain name in bad faith, having directed it to a website purporting to be the Complainant's official store in order to attract Internet users for commercial gain by creating a likelihood of confusion with the Complainant's marks.

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

The Panel acknowledges that the Complainant has established rights in the LITTLE SEED FARM trademark. [WIPO Overview 3.1](#), section 1.2.1.

The applicable generic Top-Level Domain ("gTLD") in a domain name (e.g., ".shop") is viewed as a standard registration requirement and as such is disregarded when assessing whether a disputed domain name is confusingly similar to a complainant's trademark. Thus, the Panel disregards the gTLD in its application of the confusing similarity test. [WIPO Overview 3.1](#), section 1.11.1.

The disputed domain name reproduces the term "little seed" used in the Complainant's LITTLE SEED FARM mark and replaces the term "farm" with the term "skin". While the disputed domain name does not reproduce the Complainant's trademark in its entirety, the Panel finds that the Complainant's mark is still clearly recognizable within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the Complainant's mark for purposes of the first element. [WIPO Overview 3.1](#), section 1.7. The content of the website at the disputed domain name, which displays the Complainant's LITTLE SEED FARM mark and products, confirms the confusing similarity. [WIPO Overview 3.1](#), section 1.15.

The Panel therefore finds that the Complainant has satisfied the requirements of paragraph 4(a)(i) of the Policy in establishing its rights in the LITTLE SEED FARM trademark and in showing that the disputed domain name is confusingly similar to its mark.

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.

In this case, the Complainant asserts that it has never authorized or licensed the Respondent to use the LITTLE SEED FARM marks in any manner and that no relationship exists between the Parties. The Complainant further asserts that the Respondent has appropriated the disputed domain name to mislead consumers searching for the Complainant's products. Having reviewed the available record, the Panel finds that the Complainant has established a prima facie case that the Respondent lacks rights or legitimate interests in the disputed domain name.

The Respondent did not file a response and has therefore failed to assert factors or put forth evidence to establish that it enjoys rights or legitimate interests in the disputed domain name.

According to the Complainant, the Respondent is not affiliated or connected with the Complainant in any manner, and the Complainant has not granted the Respondent any license or authorization to use or register a domain name confusingly similar to the Complainant's LITTLE SEED FARM marks. The Respondent did not respond to the Complaint and did not provide any information or factors that could potentially establish prior rights or legitimate interests in the disputed domain name. The Respondent's conduct cannot be deemed legitimate or genuine use. Such conduct indicates a clear intent to exploit the Complainant's marks for commercial gain through passing off, which can never confer rights or legitimate interests on a respondent. This conduct includes directing the disputed domain name to a website that purports to be the Complainant's online store through the use of various language on the website's homepage including: "At Little Seed Farm, we believe that true beauty begins with nature and a commitment to sustainable living", and the following language appearing in the site's "About Us" section: "Founded in 2012, Little Seed Farm was born from a desire to live sustainably and create high-quality, natural skincare". The site also includes the following copyright notice: "© 2026 Little Seed Farm. All rights reserved.", featuring the Complainant's LITTLE SEED FARM mark, and offering skincare products bearing this mark. See [WIPO Overview 3.1](#), section 2.13.1.

The Panel further observes that, taking into consideration that the Complainant offers skincare products, the substitution of the term "farm" with the term "skin" in the disputed domain name does not reduce the risk of confusion. The term "skin" evokes the nature of the Complainant's goods and reinforces the impression that the disputed domain name is associated with or operated by the Complainant.

Based on the foregoing as well as the Panel's findings below, the Panel finds that the Respondent has no rights or legitimate interests in the disputed domain name pursuant to paragraph 4(a)(ii) of the Policy.

C. Registered and Used in Bad Faith

The third and final element that a complainant must prove is that the respondent has registered and is using the disputed domain name in bad faith.

Paragraph 4(b) of the Policy states that any of the following circumstances, in particular but without limitation, shall be considered as evidence of the registration and use of a domain name in bad faith:

- (i) circumstances indicating that the respondent registered or acquired the domain name primarily for the purpose of selling, renting, or otherwise transferring the domain name registration to the complainant (the owner of the trademark or service mark) or to a competitor of that complainant, for valuable consideration in excess of the respondent's documented out-of-pocket costs directly related to the domain name; or
- (ii) circumstances indicating that the respondent 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; or
- (iii) circumstances indicating that the respondent has registered the domain name primarily for the purpose of disrupting the business of a competitor; or
- (iv) circumstances indicating that the respondent is using the domain name to intentionally attempt 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 location or of a product or service on its website or location.

The examples of bad faith registration and use set forth in paragraph 4(b) of the Policy are not meant to be exhaustive of all circumstances in which bad faith may be found. Other circumstances may also be relevant in assessing whether a respondent's registration and use of a domain name is in bad faith. [WIPO Overview](#)

[3.1](#), section 3.2.1.

In the present case, the Panel finds that the registration of the disputed domain name, which is confusingly similar to the Complainant's LITTLE SEED FARM marks, combined with the Respondent's use of the LITTLE SEED FARM mark as described above to offer skincare products, indicates the Respondent's awareness of the Complainant and its trademark rights. The Respondent has also used the disputed domain name with the intent to attract, for commercial gain, Internet users by directing such users to a website that purports to be the Complainant's online store and features the Complainant's branding. The Respondent has not commented on its motives for developing and operating this website or for registering the disputed domain name. But considering all available facts in this case, the only reasonable conclusion is that the Respondent did so with the intent to mislead Internet users for commercial gain.

Such activities constitute bad faith acts for purposes of paragraph 4(b)(iv) of the Policy. The Panel therefore finds that the third and final element required under the Policy has been established.

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 <littleseedskin.shop> be transferred to the Complainant.

/Joseph Simone/

Joseph Simone

Sole Panelist

Date: July 17, 2026