ADMINISTRATIVE PANEL DECISION

Amina Corp v. Louis Graham, Andrew Hall, Grayson Hudson
Case No. D2026-2354

1. The Parties

The Complainant is Amina Corp, France, represented by Coblence avocats, France.

The Respondents are Louis Graham, Andrew Hall, and Grayson Hudson, United States of America ("USA").

2. The Domain Names and Registrar

The disputed domain names <aminamuaddihq.shop>, <aminamuaddiofficial.shop>, and <aminamuaddishop.shop> are registered with Dynadot Inc (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on June 1, 2026. On June 1, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On June 3, 2026, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain names which differed from the named Respondent (REDACTED FOR PRIVACY, Super Privacy Service LTD c/o Dynadot) and contact information in the Complaint.

The Center sent an email communication to the Complainant on June 3, 2026 with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrar, requesting the Complainant to either file separate complaint(s) for the disputed domain names associated with different underlying registrants or alternatively, demonstrate that the underlying registrants are in fact the same entity and/or that all disputed domain names are under common control. The Complainant filed a first amended Complaint on June 4, 2026, and a second amended Complaint on June 9, 2026.

The Center verified that the Complaint together with the first and second amended Complaints 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 12, 2026. In accordance with the Rules, paragraph 5, the due date for Response was July 2, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on July 7, 2026.

The Center appointed Tobias Malte Müller as the sole panelist in this matter on July 14, 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 is a French company specialized in the sale of luxury shoes and accessories (leather goods, jewelry, etc.) for women under the brand AMINA MUADDI.

It results from the Complainant's documented allegations, which remains undisputed, that it is the registered owner of trademarks of verbal trademarks for "AMINA MUADDI", namely:

- International trademark No. 1371021, registered on July 27, 2017, for goods and services in classes 3, 9, 14, 18, 25, and 35 and protection granted amongst others the USA, where the Respondents are reportedly to be located; and

- International trademark No. 1766707, registered on April 5, 2023, for goods and services in classes 3, 4, 9, 14, 16, 18, 20, 21, 24, 25, 26, and 35 and designating amongst others the USA, where the Respondents are reportedly to be located.

The Complainant operates its official website under its domain name <aminamuaddi.com>.

According to the WhoIs extracts before this Panel and the information provided by the Registrar, the relevant data for the disputed domain names are the following:

- <aminamuaddihq.shop> registered on May 22, 2026 by Andrew Hall, USA;
- <aminamuaddishop.shop> registered on May 22, 2026 by Louis Graham, USA; and
<aminamuaddiofficial.shop> registered on May 16, 2026 by Grayson Hudson, USA.

The Complainant's uncontested evidence further establishes that each of the disputed domain names resolves to an active website materially identical in appearance and content, each purporting to be an online presence of the Complainant by (i) displaying the Complainant's registered trademark prominently on the upper left portion of the page; (ii) offering for sale footwear, bags, and jewelry under the Complainant's trademark at substantial discounts; (iii) using the contact email address associated with the Complainant's domain name; (iv) asserting copyright ownership through the notice "© 2026 Amina Muaddi"; and (v) employing first-person plural language attributable to the Complainant, including references to "About Us".

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:

(1) the Complaint for the three disputed domain names should be consolidated. The evidence suggests that the disputed domain names are under common control and the consolidation would be fair and equitable to all Parties;

(2) the disputed domain names are identical or confusingly similar to a trademark or service mark in which the Complainant has rights. Both elements of the Complainant's earlier word trademarks are reproduced identically, in the same order and in the same position, in the disputed domain names. The removal of spaces between the between words and the addition of acronyms or dictionary words at the end of the disputed domain names does not affect this strong overall similarity;

(3) the disputed domain names themselves do not support a legitimate claim of fair use, since they consist of the Complainant's trademark plus an additional term. Furthermore, the Respondents are not affiliated with the Complainant in any way and do not have the consent of the Complainant, whether express or implied, to register the disputed domain names or to use them to allegedly sell branded products of the Complainant. Finally, the use of the disputed domain names for the sale of counterfeit goods or impersonation, or other types of fraud can never confer rights or legitimate interests on a respondent; and

(4) the disputed domain names were registered in this context with the aim of disrupting the Complainant's activities. The Respondent's use of the disputed domain names for illegitimate activity, such as the sale of counterfeit goods, constitutes evidence of bad faith, because it is an attempt to attract Internet users for commercial gain.

B. Respondents

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

6. Discussion and Findings

Paragraph 15(a) of the Rules instructs this Panel to "decide a complaint on the basis of the statements and documents submitted and in accordance with the Policy, these Rules and any rules and principles of law that it deems applicable". Paragraph 4(a) of the Policy requires a complainant to prove each of the following three elements in order to obtain an order that disputed domain name be transferred or cancelled:

(i) the disputed domain name is identical or confusingly similar to a trademark or service mark in which the complainant has rights; and

(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.

The Panel will therefore proceed to analyze whether the three elements of paragraph 4(a) of the Policy are satisfied. Before doing so, the Panel will address the consolidation.

Consolidation: Multiple Respondents

The amended Complaint was filed in relation to nominally different domain name registrants. The Complainant alleges that the disputed domain name registrants are the same entity or mere alter egos of each other, or under common control. The Complainant requests the consolidation of the Complaint against the multiple disputed domain name registrants pursuant to paragraph 10(e) of the Rules.

The disputed domain name registrants did not comment on the Complainant's request.

Paragraph 3(c) of the Rules states that a complaint may relate to more than one domain name, provided that the domain names are registered by the same domain name holder.

In addressing the Complainant's request, the Panel will consider whether (i) the disputed domain names or corresponding websites are subject to common control; and (ii) the consolidation would be fair and equitable to all Parties, see WIPO Overview of WIPO Panel Views on Select UDRP Questions ("WIPO Overview 3.1"), section 4.11.2.

As set forth in section 4.11.2 of WIPO Overview 3.1: "Panels have considered a range of factors, typically present in some combination, as useful to determining whether such consolidation is appropriate, such as similarities in or relevant aspects of (i) the registrants' identity(ies) including pseudonyms, (ii) the registrants' contact information including email address(es), postal address(es), or phone number(s), including any pattern of irregularities, (iii) relevant IP addresses, name servers, or webhost(s), (iv) the content or layout of websites corresponding to the disputed domain names, (v) the nature of the marks at issue (e.g., where a registrant targets a specific sector), (vi) any naming patterns in the disputed domain names (e.g., <mark-country> or <mark-goods>), (vii) the relevant language/scripts of the disputed domain names particularly where they are the same as the mark(s) at issue, (viii) any changes by the respondent relating to any of the above items following communications regarding the disputed domain name(s), (ix) any evidence of respondent affiliation with respect to the ability to control the disputed domain name(s), (x) any (prior) pattern of similar respondent behavior, or (xi) other arguments made by the complainant and/or disclosures by the respondent(s)."

As regards common control, the Panel notes the following factors:

(1) the three disputed domain names follow the same naming pattern by identically placing the Complainant's trademark AMINA MUADDI at the beginning of the disputed domain names, followed by English language terms "hq" (standard acronym for "headquarters"), "shop" or "official";

(2) the three disputed domain names have been registered between May 16 and May 22, 2026, under the same Top-Level Domain ".shop", through the same privacy service "Super Privacy Service LTD c/o Dynadot", the same Registrar and using the same name server, i.e. Cloudflare;

(3) the three disputed domain names resolve to highly similar active websites, with the same catalogue structure and product categories and using the same contact email address associated with the Complainant's domain name.

In the light of these facts, this Panel finds that it is more likely than not that all the disputed domain names are subject to common control. Therefore, the Panel does not see any reasons why consolidation should not be fair and equitable.

In addition, also as regards fairness and equity, the Panel sees no reason why consolidation of the disputes would be unfair or inequitable to any Party. In particular, the Respondents were given the opportunity to object to the consolidation and to respond to both the Complaint and the Complainant's request for consolidation; however, they opted not to respond.

Accordingly, the Panel decides to consolidate the disputes regarding the nominally different disputed domain name registrants (referred to below as "the Respondent") in a single proceeding.

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 3.1, section 1.7.

The Complainant has shown rights in respect of a trademark or service mark AMINA MUADDI for the purposes of the Policy. WIPO Overview 3.1, section 1.2.1.

This mark is placed identically and at the beginning of each of the three disputed domain names. The Panel therefore finds the mark is recognizable within the disputed domain names. Accordingly, the disputed domain names are confusingly similar to the mark for the purposes of the Policy. WIPO Overview 3.1, section 1.7.

Although the addition of other terms here, "hq", "shop" or "official", may bear on assessment of the second and third elements, the Panel finds the addition of such terms does not prevent a finding of confusing similarity between the disputed domain names 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 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 the disputed domain names contain the Complainant's registered trademark entirely, plus the terms "shop", "official" and "hq", respectively. The nature of these disputed domain names carries a risk of implied affiliation: in fact, terms with an "inherent Internet connotation", such as "shop" and "official", are seen as tending to suggest sponsorship or endorsement by the trademark owner, see WIPO Overview 3.1 at section 2.5.1.

Furthermore, and as detailed above, each of the disputed domain names resolves to an active website materially identical in appearance and content, each purporting to be an online presence of the Complainant by prominently featuring the Complainant's trademarks and purporting to sell merchandise branded with the Complainant's trademarks at allegedly highly discounted prices. No identifying information as to the source of the clothing is given on the websites. Furthermore, there is no accurate and prominent disclaimer regarding the Respondent's (non-existing) relationship with the Complainant on the websites at the disputed domain names. On the contrary, the websites use the same contact email address associated with the Complainant's domain name, assert copyright ownership through the notice "© 2026 AMINA MUADDI", and employ first-person plural language attributable to the Complainant, including references to "About Us" and "Our Mission". The Panel considers this use neither a bona fide offering of goods or services nor a legitimate noncommercial or fair use of the disputed domain names in the sense of paragraph 4(c)(i) and (iii) of the Policy. In particular, the Complainant has not authorized or licensed the Respondent to use any of its trademarks in any way.

Finally, the Panel does not dispose of any elements that could lead the Panel to the conclusion that the Respondent is commonly known by the disputed domain name or that it has acquired trademark rights pursuant to paragraph 4(c)(ii) of the Policy.

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 3.1, section 3.2.1. One of these circumstances is that the Respondent by using the disputed domain names, has intentionally attempted to attract, for commercial gain, Internet users to its websites or other online locations, by creating a likelihood of confusion with the Complainant's marks as to the source, sponsorship, affiliation, or endorsement of its websites or locations or of a product or service on its websites or locations (paragraph 4(b)(iv) of the Policy). This is the case here:

In the present case, the Panel notes that according to the Complainant's documented allegations, which remains undisputed, each of the disputed domain names resolves to an active website materially identical in appearance and content, each purporting to be an online presence of the Complainant without authorization by (i) displaying the Complainant's registered trademark; (ii) offering for sale footwear, bags, and jewelry under the Complainant's trademark at substantial discounts; (iii) using the contact email address associated with the Complainant's domain name; (iv) asserting copyright ownership through the notice "© 2026 AMINA MUADDI"; and (v) employing first-person plural language attributable to the Complainant, including references to "About Us".

Consequently, and in the absence of any evidence to the contrary, it is therefore evident for the Panel that the Respondent positively knew the Complainant's trademark and products. Consequently, and in the absence of any evidence to the contrary, the Panel is convinced that the Respondents also knew that the disputed domain names included the Complainant's trademark when it registered them. Registration of a domain name which contains a third party's trademark, in awareness of said trademark and in the absence of rights or legitimate interests is suggestive of registration in bad faith (see, *e.g.*, *Vorwerk International AG v. ayoub lagnadi, Lagnadi LTD*, WIPO Case No. D2022-1592). While the ability to purchase the goods is not known to the Panel, the alleged commercial offering and impersonation of the Complainant is sufficient to establish the Respondent's bad faith intent to mislead Internet users.

In this regard, further circumstances surrounding the disputed domain names' registration and use confirm the findings that the Respondent has registered and is using the disputed domain names in bad faith:

(1) the nature of the disputed domain names incorporating the Complainant's trademark with the addition of the terms closely related to the Complainant and/or its business;

(2) a clear absence of rights or legitimate interests coupled with no response for the Respondent's choice of the disputed domain names; and

(3) the failure of the Respondent to submit a response or to provide any evidence of actual or contemplated good-faith use of the disputed domain names.

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 <aminamuaddihq.shop>, <aminamuaddiofficial.shop>, and <aminamuaddishop.shop> be transferred to the Complainant.

/Tobias Malte Müller/
Tobias Malte Müller
Sole Panelist
Date: July 28, 2026