ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION

Salt & Stone v. pi te
Case No. D2026-2394

1. The Parties

The Complainant is Salt & Stone, United States of America ("United States"), represented by Thorpe North & Western, United States.

The Respondent is pi te, United States.

2. The Domain Name and Registrar

The disputed domain name <saltandstonaen.vip> is registered with Dynadot Inc (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on June 2, 2026. On June 3, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On June 4, 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, Super Privacy Service LTD c/o Dynadot) and contact information in the Complaint. The Center sent an email communication to the Complainant on June 8, 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 8, 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 17, 2026. In accordance with the Rules, paragraph 5, the due date for Response was July 7, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on July 9, 2026.

The Center appointed Bradley A. Slutsky as the sole panelist in this matter on July 20, 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 manufactures and markets personal care products branded with the mark SALT & STONE. The Complainant has used this mark in commerce since at least as early as 2017, and has a number of trademark registrations for SALT & STONE, including the following:

Mark	Jurisdiction	Reg. No.	Reg. Date	Int'l Class(es)	Goods / Services
SALT & STONE	United States	5,188,252	April 18, 2017	3	Non-medicated lip balm; Sunscreen creams and preparations; Skin, face and body lotions; Oils for cosmetic purposes; Cosmetic sun oils; Cosmetic preparations; Body butters; Sun creams.
SALT & STONE	United States	5,826,235	August 6, 2019	3	Personal care products, namely, facial cleanser, facial moisturizer, nonmedicated cleansers, namely, cleanser for shaving, lip moisturizer, facial oil, body oil, body scrub, body wash, nonmedicated cleansers, namely, body cleansers, body moisturizer, skin soap, non-medicated hand soap, bar soap, liquid bath soap, shampoo, hair conditioner, deodorant for personal use, toothpaste; Perfumes, aftershaves and colognes.
SALT & STONE	United States	7,651,475	January 14, 2025	3	Personal care products, namely, facial cleanser, facial moisturizer, nonmedicated facial cleansers, namely, cleanser for shaving, non-medicated lip moisturizer balms, facial oil, body oil, body scrub, body wash, non-medicated skin cleansers for the body and hands, body moisturizer, skin soap, nonmedicated hand soap, bar soap, liquid bath soap, and deodorant for personal use.

The Complainant asserts that it has invested millions of dollars in marketing and promoting its personal care products in the United States and internationally over many years, and operates a website at "www.saltandstone.com" which offers the Complainant's products for sale.

The Respondent registered the disputed domain name on November 22, 2025, and used it for a website that purported to offer the Complainant's products for sale. The Complaint asserts that "Respondent is not a licensee of any of the SALT & STONE Marks."

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 "Respondent switched the place of the 'n' and 'e' and added an 'a' in the subject domain name saltandstonaen.vip, which creates a confusingly similar domain name due to nearly entirely incorporating Complainant's trademark"[1] and that "adding a minor typographical error, such as transposing two letters and adding a letter, can be sufficient to establish that a domain name is confusingly similar." The Complainant further asserts that the Respondent has no rights or legitimate interests in respect of the disputed domain name because (1) the Complainant has been using its SALT & STONE marks since at least as early as April 18, 2017, whereas the Respondent registered the disputed domain name on November 22, 2025, (2) the Respondent has not used the disputed domain name in connection with a bona fide offering of goods or services, but rather purports to sell the Complainant's products from the disputed domain name without a license or other authorization, (3) "Respondent is attempting to mimic Salt & Stone and make consumers believe that the website [at the disputed domain name] is in fact Salt & Stone websites" by "directly cop[ying] Salt & Stone's 'SALT & STONE' logo and cop[ying] photographs directly from Salt & Stone" as well as listing the Complainant's products, and (4) "Respondent is purposefully attempting to profit from the significant value created in the SALT & STONE Marks by unlawfully and misleadingly diverting Salt & Stone customers to saltandstonaen.vip for its own commercial gain". Finally, the Complainant asserts that the following factors indicate Respondent registered and is using the disputed domain name in bad faith: (1) the Complainant has been using its SALT & STONE marks since at least as early as April 18, 2017, whereas the Respondent registered the disputed domain name on November 22, 2025, (2) the "Respondent knew of the SALT & STONE Marks and intentionally registered the [disputed] domain name in the hopes of monetizing its market value", (3) the "Respondent intentionally attempted to attract Internet users to its websites for financial gain, by creating a likelihood of confusion with Salt & Stone's SALT & STONE Marks", (4) "Internet users looking for Salt & Stone products which bear the SALT & STONE brand would clearly be deceived as to the source, sponsorship, affiliation, or endorsement of Respondent's website", and (5) "Once consumers enter Respondent's website, their attention is directed to numerous listings of products bearing the SALT & STONE logo, which blatantly copy the promotional product photographs Salt & Stone has curated."

B. Respondent

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

6. Discussion and Findings

Pursuant to paragraph 15(a) of the Rules, a panel in UDRP proceedings "shall 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".

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

(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.

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

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[1] It appears to the Panel that this description does not fully encompass the changes that the Respondent made to the Complainant's SALT & STONE marks or the Complainant's domain name in order to derive the disputed domain name.

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 Panel finds the mark is recognizable within the disputed domain name. The disputed domain name consists of the Complainant's entire SALT & STONE mark, with the ampersand (which is not permitted in domain names) expanded to the way it is pronounced in this context (i.e., "and"), with "aen" substituted for "e" at the end, and with the ".vip" generic Top-Level Domain ("gTLD") added at the end. "saltandston" is recognizable as referring to the Complainant's mark SALT & STONE, and the use of the disputed domain name for a website that mimics the Complainant's own website is further evidence of an intent to confuse users. WIPO Overview 3.1, section 1.7 ("In some cases, in assessing the first element a panel may find that the broader case context (such as website content … trading off the complainant's reputation …), supports a finding of confusing similarity with the complainant's mark."). The addition of three potentially random letters or a potentially meaningless term at the end does not change this conclusion. WIPO Overview 3.1, section 1.8 ("Where the relevant trademark is recognizable within the disputed domain name, the addition of other terms (whether … meaningless, or otherwise) would not prevent a finding of confusing similarity under the first element."); *Accenture Global Services Limited v. Registration Private / Domains By Proxy, LLC/ Eric Winter*, WIPO Case No. D2020-2281 (the complainant Accenture Global Services Limited argued that "The inclusion of the random letters 'sas' [in the disputed domain name <accenturesas.com>] fails to negate confusing similarity"; the Panel found "The mark is incorporated within the disputed domain name and can be easily recognized, albeit the letters 'sas' have been added. The Panel finds that the addition of these letters does not serve to remove the confusing similarity with the Complainant's ACCENTURE mark. It is [] very well-established that the addition of a term or letters in a disputed domain name which clearly incorporates a complainant's trade mark is insufficient to make it non-confusingly similar with the trade mark."). See also WIPO Overview 3.1, section 1.9 ("A domain name which consists of a variation of a trademark … is considered by panels to be confusingly similar to the relevant mark for purposes of the first element. … Examples of such variations include … the addition or interspersion of other terms or numbers … ."). Further, the ".vip" gTLD "is viewed as a standard registration requirement and as such is disregarded under the first element confusing similarity test." WIPO Overview 3.1, section 1.11.1.

Accordingly, 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 a respondent may demonstrate rights or legitimate interests in a disputed domain name.

"Any of the following circumstances, in particular but without limitation, if found by the Panel to be proved based on its evaluation of all evidence presented, shall demonstrate [Respondent's] rights or legitimate interests to the domain name for purposes of paragraph 4(a)(ii):

(i) before any notice to [the Respondent] of the dispute, [the Respondent's] use of, or demonstrable preparations to use, the [disputed] domain name or a name corresponding to the [disputed] domain name in connection with a bona fide offering of goods or services; or

(ii) [the Respondent] (as an individual, business, or other organization) [has] been commonly known by the [disputed] domain name, even if [the Respondent has] acquired no trademark or service mark rights; or

(iii) [the Respondent is] making a legitimate noncommercial or fair use of the [disputed] domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue". Paragraph 4(c) of the Policy.

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.

There is no evidence that the Respondent has used or prepared to use the disputed domain name in connection with a bona fide offering or goods or services, or has been commonly known by the disputed domain name, or is making a legitimate noncommercial or fair use of the disputed domain name.

The Respondent is not licensed to use the Complainant's SALT & STONE marks, yet has used them to register the disputed domain name and create a website at that domain that mimics the Complainant's website and copies images from the Complainant's website. "Panels have categorically held that the use of a domain name for illegal activity (e.g., … copycat sites, passing off, or other types of fraud) can never confer rights or legitimate interests on a respondent." WIPO Overview 3.1, section 2.13.1. "Evidence that … the respondent has misappropriated copyrighted images from the complainant's website … [has] been found relevant in this regard." WIPO Overview 3.1, section 2.13.2.

The fact that the Respondent registered a domain name that corresponds to the Complainant's marks and then created a website at the disputed domain name that mimics the Complainant's website and copies images from the Complainant's website suggests that the Respondent registered and is using the disputed domain name to trade on the goodwill associated with the Complainant's marks, rather than to undertake activity associated with a name by which the Respondent has been commonly known, or to engage in bona fide, noncommercial, or fair use activities.

Accordingly, 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. Specifically, "the following circumstances, in particular but without limitation, if found by the Panel to be present, shall be evidence of the registration and use of a domain name in bad faith:

(i) circumstances indicating that [the Respondent has] registered or [the Respondent has] acquired the domain name primarily for the purpose of selling, renting, or otherwise transferring the domain name registration to the complainant who is 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) [the Respondent has] 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) [the Respondent has] registered the domain name primarily for the purpose of disrupting the business of a competitor; or

(iv) by using the domain name, [the Respondent has] intentionally attempted to attract, for commercial gain, Internet users to [the Respondent's] web site or other on-line 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 [the Respondent's] website or location." Paragraph 4(b) of the Policy.

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.

In the present case, the Panel notes that, more than eight years after the Complainant's first use of its marks, the Respondent registered the disputed domain name and, without a license from the Complainant, mimicked the Complainant's website, copied images from the Complainant's website, and purports to offer the Complainant's products for sale from the website at the disputed domain name.

"If … circumstances indicate that the respondent's intent in registering the disputed domain name was in fact to profit in some fashion from or otherwise exploit the complainant's trademark, panels will find bad faith on the part of the respondent. Although panel assessment remains fact-specific, generally speaking such circumstances, alone or together, include: (i) the respondent's likely knowledge of the complainant's rights, … [and] (iv) website content targeting the complainant's trademark … ." WIPO Overview 3.1, section 3.1.1. *See also* WIPO Overview 3.1, section 3.1.4 ("Panels have moreover found the following types of evidence to support a finding that a respondent has registered a domain name to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the complainant's mark … redirecting the domain name to or mimicking the complainant's (or a competitor's) website)".

In a similar case, it appears the Respondent registered a domain name with the same registrar in the same month as in this matter, and then used images from the complainant's website to mimic the complainant's website and purported to offer the complainant's goods for sale without a license, and the Panel held that "the Respondent has intentionally misappropriated the Complainant's pictorial and literary content in an attempt to mimic the Complainant's official website and impersonate the Complainant. Moreover, it is equally clear that the Respondent intentionally registered the disputed domain name to mimic the Complainant's Trademarks and official 'www.portlandleathergoods.com' website. ... Thus, the Panel infers the Respondent's bad faith based on the fact that the Respondent is trying to mimic the Complainant's official domain name." *Portland Leather Goods, Inc. v. pi te*, WIPO Case No. D2025-4858. This further supports an inference of bad faith in the present case.

Accordingly, 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 <saltandstonaen.vip> be transferred to the Complainant.

/Bradley A. Slutsky/
Bradley A. Slutsky
Sole Panelist
Date: August 3, 2026