

ADMINISTRATIVE PANEL DECISION

StyleCraft Home Collection v. Brooks Douglas
Case No. D2026-2880

1. The Parties

Complainant is StyleCraft Home Collection, United States of America (“United States”), represented by Butler Snow LLP, United States.

Respondent is Brooks Douglas, United States.

2. The Domain Name and Registrar

The disputed domain name <stylecrafthome.com> is registered with Gname.com Pte. Ltd. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on July 1, 2026. On July 2, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On July 3, 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 (Gname.com Pte. Ltd. / Redacted for Privacy) and contact information in the Complaint. The Center sent an email communication to Complainant on July 7, 2026, providing the registrant and contact information disclosed by the Registrar, and requesting Complainant to submit an amendment to the Complaint. Complainant filed an amended Complaint on July 10, 2026 and clarified its choice of Mutual Jurisdiction on August 11, 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 Respondent of the Complaint, and the proceedings commenced on July 13, 2026. In accordance with the Rules, paragraph 5, the due date for Response was August 2, 2026. Respondent did not submit any response. Accordingly, the Center notified Respondent’s default on August 9, 2026.

The Center appointed Scott R. Austin as the sole panelist in this matter on August 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 following facts appear from the Complaint (as amended) and its attached Annexes, which have not been contested by Respondent.

Complainant is a Mississippi corporation that markets and sells home décor, including lighting, wall décor, mirrors, accessories, and accent furniture under the trademark STYLECRAFT (the “STYLECRAFT Mark”) including online at its website (the “Official Website”) accessed through its official domain name <stylecraftonline.com>.

Complainant has submitted evidence of registered trademark rights in the STYLECRAFT Mark in the United States through ownership of United States Trademark Registration No. 4,243,287, STYLECRAFT, registered on November 13, 2012 for furniture in International Class 20 and claiming a first use date at least as early as November 25, 1968.

The disputed domain name was registered on February 14, 2023. Complainant shows that as of the filing of the Complaint, the disputed domain name resolved to a commercial home-décor site that prominently used the STYLECRAFT Mark, and mimicked Complainant’s website design. The Panel’s independent investigation of the disputed domain name found that as of the date visited, August 25, 2026, the website continued to display a home décor site using the STYLECRAFT Mark and offering home décor products and furniture, including table and desk lamps. Numerous cases support a panel’s power to undertake such limited factual research, and the Panel has, in its discretion, examined the disputed domain name as well as the United States Patent and Trademark Office (“USPTO”) database for the current status of Complainant’s United States trademark registration data.¹

5. Parties’ Contentions

A. Complainant

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

Notably, Complainant contends: 1) that the disputed domain name is confusingly similar to Complainant’s STYLECRAFT Mark because it incorporates the STYLECRAFT Mark in its entirety and appends the term “home”, which does not prevent a finding of confusing similarity; 2) that Respondent has no rights or legitimate interests in the disputed domain name, nor has Respondent ever been commonly known by the disputed domain name; and 3) that the disputed domain name was registered and is being used in bad faith because Respondent has chosen to register a confusingly similar domain name to divert Internet traffic away from Complainant’s website for the purpose of disrupting the business of Complainant for Respondent’s monetary gain.

¹ “Noting in particular the general powers of a panel articulated inter alia in paragraphs 10 and 12 of the UDRP Rules, it has been accepted that a panel may undertake limited factual research into matters of public record if it would consider such information useful to assessing the case merits and reaching a decision, in particular to affirm or corroborate a party’s contention. This may include visiting the website linked to the disputed domain name in order to obtain more information about the respondent or its use of the domain name [...] or accessing trademark registration databases.” WIPO Overview of WIPO Panel Views on Select UDRP Questions (“[WIPO Overview 3.1](#)”), section 4.8. See, e.g., *Humble Bundle, Inc. v. Domain Admin, Whois Privacy Corp.*, WIPO Case No. [D2016-0914](#); and *Creative NetVentures, Inc. v. Webheads*, WIPO Case No. [D2000-1655](#).

B. Respondent

Respondent did not reply to Complainant's contentions.

6. Discussion and Findings

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

The onus is on Complainant to make out its case, and it is apparent from the terms of the Policy that Complainant must show that all three elements set out in paragraph 4(a) of the Policy have been established before any order can be made to transfer or cancel a domain name. As the proceedings are administrative, the standard of proof under the Policy is often expressed as the "balance of probabilities" or "preponderance of the evidence" standard. Under this standard, an asserting party needs to establish that it is more likely than not that the claimed fact is true. [WIPO Overview 3.1](#), section 4.2.

Thus, for Complainant to succeed it must prove within the meaning of paragraph 4(a) of the Policy and on the balance of probabilities that:

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

The Panel finds that Complainant has met its burden in all three elements of the Policy and will deal with each of these elements in more detail below.

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 Complainant's trademark and the disputed domain name. [WIPO Overview 3.1](#), section 1.7.

Complainant has shown rights in respect of the STYLECRAFT Mark for purposes of the Policy through its submitted United States Trademark Registration No. 4243287 certificate issued for the STYLECRAFT Mark. A national or regional trademark registration is prima facie evidence of trademark rights. [WIPO Overview 3.1](#), section 1.2.1. See also *Advance Magazine Publishers Inc., Les Publications Conde Nast S.A. v. Voguechen*, WIPO Case No. [D2014-0657](#); see also *Janus International Holding Co. v. Scott Rademacher*, WIPO Case No. [D2002-0201](#).

With Complainant's rights in the STYLECRAFT Mark established, the remaining question under the first element of the Policy is whether the disputed domain name is identical or confusingly similar to Complainant's STYLECRAFT Mark. Complainant contends that the disputed domain name is nearly identical and confusingly similar to Complainant's STYLECRAFT Mark.

The disputed domain name reproduces the STYLECRAFT Mark in its entirety and merely adds the term "home". The STYLECRAFT Mark is therefore clearly recognizable within the disputed domain name. The addition of the term "home" does not prevent a finding of confusing similarity. [WIPO Overview 3.1](#), sections 1.7 and 1.8. Prior UDRP panels have held "in cases where a domain name incorporates the entirety of a trademark, or where at least a dominant feature of the relevant mark is recognizable in the domain name, the domain name will normally be considered confusingly similar to that mark for purposes of UDRP standing". See *Fondation Le Corbusier v. Monsieur Bernard Weber, Madame Heidi Weber*, WIPO

Case No. [D2003-0251](#); see also *Fat Face Holdings Limited v. 李亚峰 (Li Ya Feng)*, WIPO Case No. [D2024-0919](#).

Prior UDRP panels have also found the generic Top Level Domain “.com” is a standard registration requirement and may be disregarded for purposes of the first element comparison. [WIPO Overview 3.1](#), section 1.11.1; see also *L’Oréal v. Tina Smith*, WIPO Case No. [D2013-0820](#).

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 Respondent may demonstrate rights or legitimate interests in a disputed domain name.

Although the overall burden of proof in UDRP proceedings is on Complainant, where a complainant makes out a prima facie case that a respondent lacks rights or legitimate interests, the burden of production shifts to the respondent to come forward with relevant evidence demonstrating rights or legitimate interests, while the ultimate burden of proof 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 that Complainant has established a prima facie case that Respondent lacks rights or legitimate interests in the disputed domain name. The record contains no evidence that Respondent has been commonly known by “StyleCraft”, “StyleCraft Home”, or the disputed domain name; Complainant has not authorized Respondent to use the STYLECRAFT Mark; and Respondent has not come forward with evidence of any bona fide offering of goods or services or legitimate noncommercial or fair use.

The composition of the disputed domain name, together with the website content at the disputed domain name, also weighs against a claim of fair use. A domain name consisting of a trademark plus an additional term cannot constitute fair use where, in the circumstances, it effectively impersonates or suggests sponsorship or endorsement by the trademark owner. [WIPO Overview 3.1](#), sections 2.5.1 and 2.5.2. Here, the addition of the term “home” also reinforces, rather than dispels, an implied affiliation because it describes Complainant’s field of commerce, and the associated website used the StyleCraft name while offering the same category of home-décor goods.

Moreover, the unrebutted record shows that Respondent’s website as described above, mimicked Complainant’s website design, thereby creating the impression of Complainant’s sponsorship or affiliation. Panels have held that use of a domain name for passing off can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.1](#), section 2.13.1. Respondent has not rebutted Complainant’s prima facie showing.

The Panel finds the second element of the Policy has been established.

C. Registered and Used in Bad Faith

The Panel notes that, for purposes of paragraph 4(a)(iii) of the Policy, paragraph 4(b) of the Policy sets out non-exhaustive circumstances that, if found by the Panel to be present, constitute evidence of registration and use of a domain name in bad faith. Bad faith under the UDRP is broadly understood to occur where a respondent takes unfair advantage of or otherwise abuses a complainant’s mark. [WIPO Overview 3.1](#), section 3.1.

The Panel finds on the balance of probabilities that Respondent registered the disputed domain name with Complainant and its STYLECRAFT Mark in mind. Complainant's United States registration predates the February 14, 2023 registration of the disputed domain name by more than 10 years. More importantly, the disputed domain name combines the STYLECRAFT Mark in its entirety with the term "home", which corresponds directly to Complainant's area of activity, and Respondent then used the disputed domain name for a website that, according to the unrebutted record, prominently used the StyleCraft name as its own branding while offering home décor products. Those circumstances demonstrate targeting and support an inference of Respondent's knowledge of Complainant and its mark at registration. [WIPO Overview 3.1](#), section 3.2.1.

Respondent's use also establishes bad faith under paragraph 4(b)(iv) of the Policy. The evidence shows that Respondent has used the disputed domain name to attract Internet users to a commercial website presented under the StyleCraft name and offering home décor products, by creating a likelihood of confusion as to source, sponsorship, affiliation, or endorsement for commercial gain. [WIPO Overview 3.1](#), section 3.1.4. See *Amazon.com, Inc. v. MCL International Limited*, WIPO Case No. [D2000-1678](#); *American Institute of Floral Designers v. Palm Coast Floral, Inc.*, WIPO Case No. [D2000-0335](#). See also *Swarovski Aktiengesellschaft v. WhoisGuard Protected / Peter D. Person*, WIPO Case No. [D2014-1447](#) (finding bad faith under paragraph 4(b)(iv) where the respondent used a mark-plus-commercial-term domain name for a website giving the appearance of an official or authorized seller).

Having reviewed the record, the Panel finds Respondent's registration and use of the disputed domain name constitutes bad faith under the Policy. The Panel therefore finds that the third element of 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 <stylecrafthome.com> be transferred to Complainant.

/Scott R. Austin/

Scott R. Austin

Sole Panelist

Date: September 2, 2026