

## **ADMINISTRATIVE PANEL DECISION**

Leatherman Tool Group, Inc. v. Eichel Amsel, Amsel Eichel  
Case No. D2026-3414

### **1. The Parties**

The Complainant is Leatherman Tool Group, Inc., United States of America ("Unites States"), represented by Safenames Ltd, United Kingdom.

The Respondent is Eichel Amsel, Amsel Eichel, Germany.

### **2. The Domain Names and Registrar**

The disputed domain names <leatherman-danmark.com>, <leathermanhrvatska.com>, <leathermanjapan.com>, <leatherman-nederland.com>, <leathermannewzealand.com>, <leatherman-portugal.com>, <leathermanschweiz.com> and <leathermanslovenija.com> are registered with CNOBIN Information Technology Limited (the "Registrar").

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on July 31, 2026. On August 4, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On August 5, 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") and contact information in the Complaint. The Center sent an email communication to the Complainant on August 6, 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 August 7, 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 August 12, 2026. In accordance with the Rules, paragraph 5, the due date for Response was September 1, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on September 2, 2026.

The Center appointed Martin Švorčík as the sole panelist in this matter on September 4, 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 Leatherman Tool Group, Inc., a United States company founded in 1983 and operating in the field of multi-purpose tools, knives, pocket tools, and related products. The Complainant offers its products through its official website at “www.leatherman.com” and through third-party retailers such as Amazon, Cotswold Outdoor and Multi-Tool Store.

The Complainant owns trademark registrations for LEATHERMAN, including:

United States Trademark Registration No. 1325473 for LEATHERMAN, registered on March 19, 1985, in class 8;

European Union Trade Mark Registration No. 000041731 for LEATHERMAN, registered on March 31, 2004, in classes 18, 25, and 28; and

International Trademark Registration No. 1361864 for LEATHERMAN, registered on July 20, 2017, in class 14.

The disputed domain names <leatherman-danmark.com>, <leathermanhrvatska.com>, <leathermanjapan.com>, <leatherman-nederland.com>, <leathermannewzealand.com>, <leatherman-portugal.com>, <leathermanschweiz.com>, and <leathermanslovenija.com> were registered on February 27, 2026. The Registrar disclosed the Respondent as Eichel Amsel, Amsel Eichel, Germany.

The evidence submitted by the Complainant shows that the disputed domain names previously resolved to online stores displaying the LEATHERMAN trademark and logo, images of the Complainant’s products, and listings for LEATHERMAN-branded products.

On June 30, 2026, the Complainant sent a cease-and-desist letter via the Registrar in relation to all of the disputed domain names except <leathermanjapan.com>, requesting, among other things, transfer of the relevant disputed domain names.

With respect to <leathermanjapan.com>, the Complainant had previously submitted a takedown request to the Registrar in March 2026. On March 19, 2026, the Registrar’s Anti Abuse Team informed the Complainant that the complained-of content had been removed.

Subsequently the disputed domain names did not resolve to active websites.

#### **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.

In particular, the Complainant submits that:

- the disputed domain names are confusingly similar to its LEATHERMAN trademark, which is incorporated in its entirety, while the additional geographical terms does not prevent a finding of confusing similarity;
- the Respondent has no rights or legitimate interests in the disputed domain names because the Respondent has not been authorized or licensed to use the LEATHERMAN trademark, is not commonly

known by the disputed domain names, and previously used the disputed domain names for websites displaying the Complainant's trademark, logo, product images, and LEATHERMAN-branded products; and - the disputed domain names were registered and are being used in bad faith because they incorporate the Complainant's LEATHERMAN trademark together with geographical terms corresponding to countries in which the Complainant operates, and were previously used for websites giving the impression of an association with the Complainant and offering LEATHERMAN-branded products. The Complainant further relies on the subsequent non-use of the disputed domain names.

## **B. Respondent**

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

## **6. Discussion and Findings**

The Registrar has confirmed that all eight disputed domain names are registered in the name of the same Respondent. The Panel therefore finds that the Complaint may proceed in respect of all of the disputed domain names in a single proceeding pursuant to paragraph 3(c) of the Rules.

Paragraph 4(a) of the Policy requires the Complainant to establish that:

- (i) each 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 each disputed domain name; and
- (iii) each 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 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 that the entirety of the LEATHERMAN mark is reproduced within each of 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 the geographical terms "danmark", "hrvatska", "japan", "nederland", "newzealand", "portugal", "schweiz", and "slovenija", may bear on assessment of the second and third elements, the Panel finds that 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 Complainant states that it has not authorized or licensed the Respondent to use the LEATHERMAN trademark. There is no evidence that the Respondent has been commonly known by the disputed domain names.

The available evidence shows that the disputed domain names were previously used for websites displaying the Complainant’s LEATHERMAN trademark and logo, images of the Complainant’s products, and listings for LEATHERMAN-branded products, without indicating websites’ lack of relationship with the Complainant. Such use does not constitute a bona fide offering of goods or services or a legitimate noncommercial or fair use of the disputed domain names.

Moreover, the nature of the disputed domain names, incorporating the Complainant’s LEATHERMAN trademark together with geographical terms, coupled with their prior use, signals the Respondent’s intention of taking unfair advantage of the likelihood of confusion between the disputed domain names and the Complainant as to the origin or affiliation of the websites at the dispute domain names.

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, the Complainant’s trademark rights substantially predate the registration of the disputed domain names. Each of the disputed domain names incorporates the Complainant’s LEATHERMAN trademark in its entirety together with a geographical term. The evidence further shows that the disputed domain names previously resolved to online stores displaying the Complainant’s LEATHERMAN trademark and logo, images of the Complainant’s products, and listings for LEATHERMAN-branded products, without indicating websites’ lack of relationship with the Complainant. In the circumstances, the Panel considers that the Respondent was aware of the Complainant and its trademark when registering the disputed domain names and selected them with the Complainant in mind. [WIPO Overview 3.1](#), sections 3.2.1 and 3.2.2.

The evidence further shows that the disputed domain names were used for commercial websites which created the impression of an association with the Complainant. By using the disputed domain names in this manner, the Respondent intentionally attempted to attract, for commercial gain, Internet users to its websites by creating a likelihood of confusion with the Complainant’s LEATHERMAN trademark as to the source, sponsorship, affiliation, or endorsement of the websites or of the products offered on them. The Panel finds that such use constitutes bad faith under paragraph 4(b)(iv) of the Policy.

Furthermore, panels have found that the non-use of a domain name would not by itself prevent a finding of bad faith under the doctrine of passive holding. To the contrary, in looking at the totality of circumstances in each case, panels have found that the registration and non-use of a domain name can still constitute bad faith for purposes of the Policy. [WIPO Overview 3.1](#), section 3.3.

Having reviewed the available record, the Panel notes the distinctiveness or reputation of the Complainant's trademark, the composition of the disputed domain names and their prior use, and finds that in the circumstances of this case, the current passive holding of the disputed domain names does not prevent a finding of bad faith under the Policy.

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 <leatherman-danmark.com>, <leathermanhrvatska.com>, <leathermanjapan.com>, <leatherman-nederland.com>, <leathermannewzealand.com>, <leatherman-portugal.com>, <leathermanschweiz.com> and <leathermanslovenija.com> be transferred to the Complainant.

*/Martin Švorčík/*

**Martin Švorčík**

Sole Panelist

Date: September 10, 2026