

ADMINISTRATIVE PANEL DECISION

Frederick Donahue, Hells Angels Richmond v. Wei Tiara, tiyara
Case No. D2026-3689

1. The Parties

Complainant is Frederick Donahue, Hells Angels Richmond, United States of America ("United States"), represented by Tango MMP, United States of America.

Respondent is Wei Tiara, tiyara, Indonesia.

2. The Domain Name and Registrar

The disputed domain name <hellsangelsrichmond.com> is registered with GoDaddy.com, LLC (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on August 18, 2026. On August 18, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On August 18, 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 (Registration Private, Domains By Proxy, LLC) and contact information in the Complaint. The Center sent an email communication to Complainant on August 21, 2026, providing the registrant and contact information disclosed by the Registrar, and inviting Complainant to submit an amendment to the Complaint. Complainant filed an amendment to the Complaint on August 22, 2026.

The Center verified that the Complaint together with the amendment to the 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 August 27, 2026. In accordance with the Rules, paragraph 5, the due date for Response was September 16, 2026. Respondent did not submit any response. Accordingly, the Center notified Respondent's default on September 21, 2026.

The Center appointed Marina Perraki as the sole panelist in this matter on September 23, 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

Per the Complaint, Complainant operated a website under the disputed domain from 2012 until March 2026. He continuously used it to promote the activities of “the Hells Angels Richmond chapter” until the disputed domain name inadvertently lapsed in March 2026.

Complainant is, per Complaint, an authorized user of the HELLS ANGELS trademarks. The HELLS ANGELS trademarks include, for example, per independent Panel research, the United States trademark registration No. 1943341, HELLS ANGELS, word, filed on April 20, 1993, and registered on December 26, 1995, for goods in international class 16.¹ Furthermore, Complainant has used the HELLS ANGELS RICHMOND unregistered mark for several years.

The disputed domain name was registered on February 4, 2011, and lapsed in March 2026. It was then acquired by Respondent. The Whois records show an “Updated Date” of March 22, 2026.

The disputed domain name at the time of filing of the Complaint redirected to the website “www.hi-gardensheds.com” containing casino content, which per Complainant was fake. Prior to that, per Complainant, the website, while in Respondent’s hands, involved reproduction of the Complainant’s prior website content including the HELLS ANGELS trademarks, without any authorization. The Internet Archive’s Wayback Machine shows a website substantially similar to Complainant’s still resolved as of April 14, 2026.

Complainant entered into communications with Respondent through the Registrar’s broker service to retake ownership of the disputed domain name to which Respondent did not reply.

Currently the disputed domain name leads to an inactive website.

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.

B. Respondent

Respondent did not reply to the Complainant’s contentions.

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. [WIPO Overview 3.1](#), section 4.8.

6. Discussion and Findings

Paragraph 4(a) of the Policy lists the three elements which Complainant must satisfy with respect to the disputed domain name:

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

(ii) 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.

6.1. Procedural Issue - Standing of Complainant

A trademark owner's affiliate such as a subsidiary, or an exclusive trademark licensee is considered to have rights in a trademark under the UDRP for purposes of standing to file a complaint, while a non-exclusive trademark licensee would typically not have standing to file a UDRP complaint. WIPO Overview of WIPO Panel Views on Select UDRP Questions ("[WIPO Overview 3.1](#)"), section 1.4.1.

In the present case, Complainant asserts and Respondent has not rebutted, that Complainant operated the website under the disputed domain name from 2012 until March 6, 2026. Complainant asserts that he used on his website the trademarks HELLS ANGELS®, HAMC®, the Death Heads logo®, owned by Hells Angels Motorcycle Corporation ("the HELLS ANGELS trademarks"), with full authorization. Complainant has provided two screenshots of the website from the years 2016 and 2025 showing use of such trademarks. Independent Panel research has confirmed that the website contained notices on the ownership of the HELLS ANGELS trademarks and that Complainant is linked to Hells Angels. Further, the official website of the Hells Angels Motorcycle Corporation ("www.hells-angels.com") lists Hells Angels Richmond on its list of official charters, stating that it was "established in 1962"; the website provides a link to the disputed domain name. Given the above, the Panel accepts that Complainant, as an affiliate of Hells Angels Motorcycle Corporation for purposes of the Policy, maintained and operated the website under the disputed domain name for several years. Under this premise, the Panel also accepts that Complainant has standing to file the Complaint.

6.2. Substantive Issues

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 3.1](#), section 1.7.

The Panel notes that Complainant is an authorized user of the HELLS ANGELS trademarks and furthermore, Complainant has used the HELLS ANGELS RICHMOND unregistered mark for several years. Complainant has demonstrated source identifying capacity under said mark, which is further confirmed by Respondent's initial use of the disputed domain name, as discussed further below. [WIPO Overview 3.1](#), section 1.3.

The entirety of the HELLS ANGELS RICHMOND trademark is reproduced within the disputed domain name. Accordingly, the disputed domain name is identical to the trademark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

The generic Top-Level Domain ("gTLD") ".com" is disregarded, as gTLDs typically do not form part of the comparison on the grounds that they are required for technical reasons (*Rexel Developpements SAS v. Zhan Yequn*, WIPO Case No. [D2017-0275](#); *Hay & Robertson International Licensing AG v. C. J. Lovik*, WIPO Case No. [D2002-0122](#)).

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 Complainant has established a prima facie case that Respondent lacks rights or legitimate interests in the disputed domain name. Respondent has not rebutted 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.

Respondent has not submitted any response and has not claimed any such rights or legitimate interests with respect to the disputed domain name. As per Complainant, Respondent was not authorized to register the disputed domain name and does not appear to be commonly known by the disputed domain name.

Respondent did not demonstrate prior to the notice of the dispute any use of the disputed domain name or a trademark corresponding to the disputed domain name in connection with a bona fide offering of goods or services.

On the contrary, the disputed domain name was asserted to have resolved to a website reproducing that of Complainant and subsequently to have redirected to a fake online casino website. Currently it leads to an inactive website.

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.

Based on Complainant’s assertions and evidence in the Complaint and the WhoIs records, Respondent acquired the disputed domain name at some point on or after March 22, 2026. Considering that the Complainant was established in 1962 and the disputed domain name was registered by Complainant in 2011, the Panel notes that Complainant’s mark had been long used at the time of the disputed domain name’s registration and subsequent acquisition by Respondent, and it seems obvious that the Respondent was aware of and had the Complainant’s mark in mind when registering the disputed domain name, which incorporates the entirety of the Complainant’s mark (*Parfums Christian Dior v. Javier Garcia Quintas and Christiandior.net*, WIPO Case No. [D2000-0226](#)).

As regards bad faith use, the record demonstrates that the disputed domain name was initially employed to host a website copying the website of Complainant and then later redirected an online casino website. The disputed domain name has been operated by intentionally creating a likelihood of confusion with the

Complainant's mark within the meaning of paragraph 4(b)(iv) of the Policy. This supports the finding of bad faith use. [WIPO Overview 3.1](#), sections 3.1.4 and 3.2.1.

Last, the Panel considers the lack of response of Respondent to this proceeding or to Complainant's attempts to reclaim ownership of the disputed domain name after its inadvertent expiry through the Registrar, and the apparent concealment of the disputed domain name holder's identity through use of a privacy shield at the time of filing the Complaint, to be further indicative of bad faith, particularly given the question in this case of the timing of Respondent's acquisition of the disputed domain name (*BHP Billiton Innovation Pty Ltd v. Domains By Proxy LLC / Douglass Johnson*, WIPO Case No. [D2016-0364](#); see also [WIPO Overview 3.1](#), section 3.6).

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 <hellsangelsrichmond.com> be transferred to the Complainant.

/Marina Perraki/

Marina Perraki

Sole Panelist

Date: October 7, 2026