ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION
Tigi Holdings Limited v. Anthony Anderson
Case No. D2026-4196

1. The Parties

The Complainant is Tigi Holdings Limited, United Kingdom, represented by Stobbs IP Limited, United Kingdom.

The Respondent is Anthony Anderson, United States of America ("United States").

2. The Domain Name and Registrar

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

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on September 17, 2026. On September 18, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On September 21, 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 (Unknown) and contact information in the Complaint. The Center sent an email communication to the Complainant on September 21, 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 September 21, 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 September 22, 2026. In accordance with the Rules, paragraph 5, the due date for Response was October 12, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on October 13, 2026.

The Center appointed Emre Kerim Yardimci as the sole panelist in this matter on October 15, 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, Tigi Holdings Limited, is a company based in the United Kingdom and is responsible for the BED HEAD brand of professional haircare and hairstyling products sold under the TIGI umbrella. The BED HEAD brand was launched in 1996 and has since been used in connection with a wide range of haircare products, including shampoos, conditioners, styling products, hairsprays, and products for men.

The brand has been promoted through salons, online retail channels, social media platforms, and the official website at “www.bedhead.com”. The record further shows that BED HEAD products have achieved substantial commercial recognition and consumer exposure internationally.

The Complainant owns trademark rights in BED HEAD, including, inter alia:

- United States Trademark Registration No. 2456838 for BED HEAD, registered on June 5, 2001, in Class 3;
- United Kingdom Trademark Registration No. UK00003535448 for BED HEAD, registered on January 8, 2021, in Class 3; and
- European Union Trade Mark Registration No. 019187288 for BED HEAD, registered on September 11, 2025, in Class 3.

The Panel notes that these registrations predate the registration of the disputed domain name.

The disputed domain name <bedheadbytigi.shop> was registered on April 22, 2026. At the time the Complaint was filed, the publicly available registration records identified a privacy service. Following registrar verification, the underlying registrant was disclosed as Anthony Anderson of Arizona, United States.

The Panel notes that, on the date of this Decision, the website to which the disputed domain name resolves was not accessible and no active content could be reviewed.

The evidence submitted by the Complainant shows that the disputed domain name resolved to a commercial website prominently displaying the designation “Bed Head by TIGI”, offering purported BED HEAD-branded haircare products for sale, reproducing the Complainant’s branding and product references, and containing statements such as “Bed Head by TIGI was established in the ‘90s as the original rebel hair brand” and “© 2026 Bed Head by TIGI. All rights reserved.”

The Complainant also submits evidence of a test purchase attempt conducted through the website associated with the disputed domain name. According to the Complaint, the transaction was not completed after the website requested payment verification information that the Complainant considered suspicious. The Complainant further states that email correspondence sent to the contact address displayed on the website did not reach a functioning recipient and that no response was received through the website’s contact form.

The Respondent did not submit a Response in this proceeding and was declared in default on October 13, 2026.

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 asserts that it owns trademark rights in BED HEAD through numerous trademark registrations and longstanding use of the mark in connection with hair care products.

The Complainant contends that the disputed domain name is confusingly similar to its BED HEAD trademark because it incorporates the mark in its entirety. According to the Complainant, the additional terms "by" and "tigi" do not prevent a finding of confusing similarity. The Complainant submits that "tigi" is closely associated with the Complainant and its BED HEAD branded products and therefore reinforces, rather than dispels, the impression that the disputed domain name is connected with the Complainant.

The Complainant further contends that the Respondent has no rights or legitimate interests in respect of the disputed domain name. The Complainant states that it has not authorized, licensed, or otherwise permitted the Respondent to use its BED HEAD trademark or to register a domain name incorporating that mark. The Complainant also submits that there is no evidence that the Respondent is commonly known by the disputed domain name.

According to the Complainant, the disputed domain name resolves to a website that prominently displays the Complainant's BED HEAD mark and offers for sale products presented as BED HEAD products. The Complainant argues that such use falsely suggests an affiliation with, or authorization by, the Complainant and therefore cannot constitute a bona fide offering of goods or services or a legitimate non-commercial or fair use of the disputed domain name.

The Complainant further submits that the disputed domain name was registered and is being used in bad faith. The Complainant argues that, given the incorporation of the BED HEAD trademark together with the term "tigi" and the content of the associated website, the Respondent was clearly aware of the Complainant and its trademark rights when registering the disputed domain name. According to the Complainant, the Respondent has intentionally attempted to attract Internet users to its website for commercial gain by creating a likelihood of confusion with the Complainant's trademark as to the source, sponsorship, affiliation, or endorsement of the website and the products offered on it.

The Complainant requests transfer of the disputed domain name.

B. Respondent

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

6. Discussion and Findings

Paragraph 4(a) of the Policy requires the Complainant to establish each of the following elements in order to obtain the requested remedy:

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

The Respondent did not submit a Response. However, the Respondent's default does not automatically result in a decision in favor of the Complainant. The Panel must nevertheless determine whether the Complainant has established each of the three elements required under paragraph 4(a) of the Policy based on the evidence in the record.

A. Identical or Confusingly Similar

The Complainant has established rights in the BED HEAD trademark through its trademark registrations, including registrations in the United States, the United Kingdom, and the European Union.

The disputed domain name incorporates the BED HEAD trademark in its entirety. The addition of the term "bytigi" does not prevent a finding of confusing similarity as the trademark BED HEAD remains clearly recognizable within the disputed domain name.

The Panel further notes that "tigi" is the name under which the Complainant's BED HEAD products are marketed and sold. This will be taken into consideration under the section "Registered and Used in Bad Faith".

It is well established that the applicable Top-Level Domain (".shop") is generally disregarded for the purpose of assessing confusing similarity under the first element of the Policy.

Accordingly, the Panel finds that the disputed domain name is confusingly similar to a trademark in which the Complainant has rights. The Complainant has therefore established the first element of paragraph 4(a) of the Policy.

B. Rights or Legitimate Interests

The onus is on the Complainant to make out at least a prima facie case that the Respondent has no rights or legitimate interests in the disputed domain name, and it is then for the Respondent to rebut this case. See section 2.1 of the WIPO Overview 3.1.

The Complainant states that it has not authorized, licensed, or otherwise permitted the Respondent to use the BED HEAD trademark or to register any domain name incorporating that mark. There is no evidence in the record that the Respondent is commonly known by the disputed domain name.

The Panel notes that the website associated with the disputed domain name was not accessible at the time of the Panel's review. Accordingly, the Panel is unable to independently assess the content of the website. However, the Complainant has submitted screenshots purporting to show use of the disputed domain name in connection with a website displaying the Complainant's trademark and containing references that appeared to present the website as an official or authorized source for the Complainant's BED HEAD products. In the absence of any explanation from the Respondent, such use supports a finding that the Respondent sought to create a false impression of association with the Complainant.

The Panel further notes that, under the principles established in *Oki Data Americas, Inc. v. ASD, Inc.*, WIPO Case No. D2001-0903 (see section 2.8.1 of the WIPO Overview 3.1), a reseller or distributor may establish rights or legitimate interests in a domain name incorporating a trademark where certain cumulative requirements are satisfied. In particular;

(i) the respondent must actually offer the goods or services at issue;
(ii) the website must be used to sell only the trademarked goods or services;
(iii) the website must accurately and prominently disclose the respondent's relationship with the trademark holder; and
(iv) the respondent must not attempt to corner the market in domain names reflecting the trademark.

In the present case, even assuming that the Respondent's purported offering of BED HEAD-branded products could be characterized as reseller activity, the Panel finds that the available evidence does not support compliance with these requirements. In particular, the screenshots submitted by the Complainant suggest that the website was presented as an official or authorized source of the Complainant's products, rather than accurately and prominently disclosing the Respondent's relationship with the Complainant. Accordingly, the Panel finds that the Respondent's use of the disputed domain name would not satisfy the Oki Data test and cannot, on this basis, establish rights or legitimate interests in the disputed domain name.

In light of the foregoing, the Panel finds that the Respondent's misleading use of the disputed domain name does not establish rights or legitimate interests. The Complainant has therefore established an unrebutted prima facie case, satisfying the second element of paragraph 4(a) of the Policy.

Accordingly, the Panel finds that the Complainant has established the second element of paragraph 4(a) of the Policy.

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.

The Panel finds that the Respondent was aware of the Complainant and its BED HEAD trademark when registering the disputed domain name. The disputed domain name reproduces the Complainant's BED HEAD trademark in its entirety and further combines it with the term "tigi". The Panel finds that this particular composition is unlikely to be coincidental and rather reinforces a false association with the Complainant and strengthens the inference that the Respondent deliberately targeted the Complainant and its trademark rights when registering the disputed domain name.

The Panel further notes that, according to the screenshots submitted by the Complainant, the website formerly associated with the disputed domain name displayed the Complainant's BED HEAD trademark and contained statements falsely suggesting an affiliation or connection with the Complainant.

The Panel finds that the Respondent used the disputed domain name to create a false impression of association with the Complainant and to attract Internet users by creating a likelihood of confusion with the Complainant's mark as to the source, sponsorship, affiliation, or endorsement of the website or the products offered thereon within the meaning of paragraph 4(b)(iv) of the Policy.

Accordingly, the Panel finds that the disputed domain name has been registered and is being used in bad faith. The Panel finds that the Complainant has established the third element of paragraph 4(a) of the Policy.

7. Decision

For the foregoing reasons, in accordance with paragraph 4(i) of the Policy and 15 of the Rules, the Panel orders that the disputed domain name <bedheadbytigi.shop> be transferred to the Complainant.

/Emre Kerim Yardimci/
Emre Kerim Yardimci
Sole Panelist
Date: November 2, 2026