COPYRIGHT CLAIMS BOARD

Docket number: 26-CCB-0636
October 8, 2026

Tanya Poole & Tanya J Poole	*v.*	Taylor Owens
CLAIMANTS		**RESPONDENT**

ORDER DISMISSING CLAIM WITHOUT PREJUDICE

The Copyright Claims Board (Board) cannot hear a copyright infringement claim if the Copyright Office has refused the claimant's application to register the work. 17 U.S.C. § 1505(a)(2). The Board is dismissing this claim because registration has been refused.

This claim was filed on October 5, 2026. The claim alleged infringement of works described in the claim as bonnets and titled "Jazzy August Bonnet Designs." The claim stated that the copyright for the works had not been registered and identified the Service Request number of an application to register the copyright. However, on September 11, 2025, the Copyright Office issued a letter refusing registration for the works in that application "because they are useful articles that do not contain any separable, copyrightable authorship needed to sustain a claim to copyright." The letter explained: "We examined your works, concluded that they are useful articles, and determined that they do not contain any separable design element with sufficient copyrightable authorship to support a registration. Consequently, we cannot register your copyright claim."

Because the registration has been refused, this claim cannot proceed. The Board must dismiss the entire proceeding without prejudice when it learns that the application to register the allegedly infringed works has been refused. 17 U.S.C. § 1505(b)(3) & 37 C.F.R. § 221.1(b). Therefore, the Board dismisses this proceeding without prejudice and closes this case.

Copyright Claims Board