

ADMINISTRATIVE PANEL DECISION

Trestles IP Holdings, LLC v. zhang qiang
Case No. D2025-5282

1. The Parties

The Complainant is Trestles IP Holdings, LLC, United States of America, represented by Weeks, Nelson Law firm, United States of America (“United States”).

The Respondent is zhang qiang, China.

2. The Domain Name and Registrar

The disputed domain name <reefuruguay.com> is registered with Paknic (Private) Limited (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on December 17, 2025. On December 18, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On December 21, 2025, 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 (Whois Agent, Web Domains by Proxy) and contact information in the Complaint. The Center sent an email communication to the Complainant on December 22, 2025, 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 December 22, 2025. A missing annex was together with the amended Complaint submitted on December 23, 2025.

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 December 29, 2025. In accordance with the Rules, paragraph 5, the due date for Response was January 18, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on January 22, 2026.

The Center appointed Willem J. H. Leppink as the sole panelist in this matter on January 26, 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 are undisputed.

The Complainant is the owner of several trademark rights, incorporating the word element REEF, including the United States trademark registration for REEF (word mark), No. 2,244,373, registered May 11, 1999, for goods in class 25, being footwear, shoes and clothing namely, shirts, shorts, jackets, and sweatshirts.

The Complainant has been using the REEF brand since as early as 1984. The Complainant and/or its affiliates sell their REEF branded products, in particular casual sandals, known as flip-flops, through the website to which the domain name registered by the Complainant, <reef.com>, resolves.

The disputed domain name was registered on May 22, 2023, and at the time of rendering this decision, resolves to a website which seems to offer REEF branded products, similar to the products offered by the Complainant.

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 contends the following.

The disputed domain name was registered more than thirty-five years after the Complainant first used the REEF trademarks in commerce and nearly thirty years after the Complainant registered the domain name <reef.com>.

The Respondent has no proprietary or legitimate rights in REEF or the disputed domain name. The Respondent is not using or preparing to use the disputed domain name or a name corresponding to the disputed domain name in connection with a bona fide offering of goods or services or a legitimate noncommercial or fair use. A review of the website to which the disputed domain name resolved, revealed that it prominently displays the REEF trademarks and is selling counterfeit goods bearing the REEF trademarks. The Complainant has not authorized or licensed the Respondent to manufacture, sell or offer for sale any products bearing its REEF trademarks. There is no indication that the Respondent is or has ever been known by the disputed domain name.

At the time the infringement was discovered on November 5, 2025, the disputed domain name resolved to a commercial website that used the REEF trademarks with counterfeit products and related imageries in connection with the offering of goods purporting to be the Complainant's products. The Respondent has copied the Complainant's images, website design, and text to create a "lookalike" shopping experience, clearly all in bad faith and intended to misleadingly divert consumers, create commercial gain and tarnish the Complainant's trademark. Such use does not constitute a bona fide offering of goods or services or a legitimate noncommercial or fair use under the Policy.

Subsequently, as of December 5, 2025, the infringing content was removed, and the disputed domain name at the time of filing the Complaint, resolves to a parked landing page, including indications that the disputed domain name is offered for sale.

The disputed domain name incorporates the Complainant's distinctive REEF trademark in its entirety together with a geographic term and was registered long after the Complainant established rights in the REEF mark through extensive use and registration. Given the longstanding fame and use of the REEF trademark, it is not plausible that the Respondent registered the disputed domain name without knowledge of the Complainant's rights.

The use of the disputed domain name as described above, constitutes evidence of bad faith.

B. Respondent

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

6. Discussion and Findings

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 Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The entirety of the mark is reproduced within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

Although the addition of other terms, here "uruguay", may bear on assessment of the second and third elements, the Panel finds the addition of such term does not prevent a finding of confusing similarity between the disputed domain name and the mark for the purposes of the Policy. [WIPO Overview 3.0](#), 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 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 3.0](#), 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 name. 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 name such as those enumerated in the Policy or otherwise.

To the contrary, the Complainant has alleged that the REEF branded products offered for sale on the website to which the disputed domain name resolves, are counterfeit, and this has not been rebutted by the Respondent.

Panels have held that the use of a domain name for illegal activity, here, the claimed sale of counterfeit goods can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13.1.

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

C. Registered and Used in Bad Faith

The Panel refers to its considerations under 6.B.

Paragraph 4(b) of the Policy sets out a list of non-exhaustive circumstances that may indicate that a domain name was registered and used in bad faith, but other circumstances may be relevant in assessing whether a respondent's registration and use of a domain name is in bad faith. [WIPO Overview 3.0](#), section 3.2.1.

Lacking a Response, the Panel finds that the Respondent has been using the disputed domain name to offer for sale potential counterfeit products. The Panel notes that the disputed domain name resolved to a website which incorporated the Complainant's trademark, and used it to offer for sale goods appearing to be Complainant's products, using the Complainant's product images and text. The Respondent has thereby intentionally attempted to attract, for commercial gain, Internet users by creating a likelihood of confusion with the Complainant's mark. It is therefore implausible that the Respondent was unaware of the Complainant and its trademarks when registering the disputed domain name.

Panels have held that the use of a domain name for illegal activity, here, the claimed sale of counterfeit goods also constitutes bad faith. [WIPO Overview 3.0](#), section 3.4. Having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain name constitutes 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 name <reefuruguay.com> be transferred to the Complainant.

/Willem J. H. Leppink/

Willem J. H. Leppink

Sole Panelist

Date: February 3, 2026