

ADMINISTRATIVE PANEL DECISION

rankingCoach GmbH v. hjfg gfhgf, zzz zxc, sdcfds, Host Master, Njalla Okta LLC

Case No. D2025-1308

1. The Parties

The Complainant is rankingCoach GmbH, Germany, represented by MSA IP - Milojevic Sekulic & Associates, Serbia.

The Respondents are hjfg gfhgf, Cananda, zzz zxc, sdcfds, Uganda, Host Master, Njalla Okta LLC, Saint Kitts and Nevis.

2. The Domain Names and Registrars

The disputed domain names <rankingcoach1.life>, <rankingcoach1.xyz>, <rankingcoach2.life>, <rankingcoach2.xyz>, <rankingcoach3.top> and <rankingcoach3.xyz> are registered with NameSilo, LLC.

The disputed domain names <rankingcoach1.online>, <rankingcoach1.store>, <rankingcoach3.com> and <rankingcoach3.dad> are registered with Tucows Domains Inc.

NameSilo, LLC and Tucows Domains Inc. are collectively referred to below as the “Registrars”.

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on March 31, 2025. On April 1, 2025, the Center transmitted by email to the Registrars a request for registrar verification in connection with the disputed domain names <rankingcoach1.store>, <rankingcoach1.online>, <rankingcoach1.xyz>, <rankingcoach1.life>, <rankingcoach2.xyz>, <rankingcoach2.life>, <rankingcoach3.xyz> and <rankingcoach3.top>. On the same day, the Registrars transmitted by email to the Center their verification responses disclosing registrant and contact information for the disputed domain names which differed from the named Respondent (Not disclosed) and contact information in the Complaint.

The Center sent an email communication to the Complainant on April 9, 2025, with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrars, requesting the Complainant to either file separate complaint(s) for the disputed domain names associated with different underlying registrants or alternatively, demonstrate that the underlying registrants are in fact the same entity and/or that all domain names are under common control.

The Complainant filed a first amended Complaint on April 17, 2025, in which it requested to add two new disputed domain names to the current proceeding, namely <rankingcoach3.com> and <rankingcoach3.dad>. On April 25, 2025, the Center transmitted by email to the Registrar Tucows Domains Inc. a request for registrar verification in connection with the newly added disputed domain names. On the same day, the Registrar Tucows Domains Inc. transmitted by email to the Center its verification response disclosing registrant and contact information for the two newly added disputed domain names that differed from the named Respondents (zzz zxc, sdcfds and hjfg gfhgf) and contact information in the first amended Complaint. The Center sent an email communication to the Complainant on April 30, 2025, with the registrant and contact information of the nominally different underlying registrants disclosed by the Registrar Tucows Domains Inc. The Complainant filed the second amended Complaint on May 5, 2025.

The Center verified that the Complaint together with the amended Complaints 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 May 7, 2025. In accordance with the Rules, paragraph 5, the due date for Response was May 27, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on May 28, 2025.

The Center appointed Mihaela Maravela as the sole panelist in this matter on June 5, 2025. 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

According to information in the Complaint, the Complainant is a German company founded in 2014 acting in the field of digital marketing application. It developed rankingCoach, which is an AI-powered digital marketing solution that provides a suite of resalable marketing solutions, including AI-powered Search Engine Optimization and Advertising (SEO and SEA), Listings, Brand & Competitor Monitoring, Online Presence, Web Reputation, and Social Media Management. The Complainant has multiple locations across Europe and the United States of America ("United States"). Its award-winning software is available in 32 countries and 14 languages, partnering with industry leaders in web hosting, content management systems (CMS), telecommunications, and marketing technology (MarTech). The Complainant optimized more than 1 million sites and received 18 international awards so far.

The Complainant is the holder of a number of trademarks for RANKINGCOACH, including the following:

- the International Registration No. 1424275 for trademark RANKINGCOACH (figurative), registered on April 10, 2018, and covering the goods and services in Classes 9, 35 and 42;
- the European Union Trademark Registration No. 013693379 for trademark RANKINGCOACH, registered on April 3, 2017, and covering the services in Classes 35 and 42;
- the United States Trademark Registration No. 5864706 for trademark RANKINGCOACH (figurative), registered on September 24, 2019, and covering the goods and services in Classes 9, 35 and 42.

The Complainant is also the owner of the domain name <rankingcoach.com>, registered on October 28, 2010, which it uses for its principal website to promote its products and services, as well as the owner of other similar domain names.

The disputed domain names <rankingcoach1.life>, <rankingcoach1.xyz>, <rankingcoach2.life>, <rankingcoach2.xyz>, <rankingcoach1.online>, and <rankingcoach1.store> were registered on August 20, 2024, and the disputed domain names <rankingcoach3.top>, <rankingcoach3.xyz>, <rankingcoach3.com> and <rankingcoach3.dad> were registered on March 28, 2025.

According to evidence submitted by the Complainant, at the date of the Complaint, the disputed domain names <rankingcoach1.xyz>, <rankingcoach1.life>, <rankingcoach1.store> and <rankingcoach1.online>, resolved to inactive pages (displaying messages such as “this site can't be reached”, or “404 not found”), the disputed domain names <rankingcoach2.xyz>, <rankingcoach2.life>, <rankingcoach3.top> and <rankingcoach3.xyz>, resolved to login pages displaying the Complainant's trademark and logo and requesting a passwords and personal data, while the disputed domain names <rankingcoach3.com> and <rankingcoach3.dad> resolved to webpages with sponsored links (“pay-per-click”, or “PPC”). The Complainant also submitted evidence that, before the Complaint, the disputed domain names <rankingcoach1.life> and <rankingcoach1.online> resolved to PPC pages offering such domain names for sale.

At the date of this Decision, all disputed domain names resolve to inactive pages (displaying messages such as “this site can't be reached”, “dangerous site” or “404 not found”), except for the disputed domain name <rankingcoach3.com> which resolves to a login page requesting a password.

There is no available information concerning the Respondents except for the information made available by the Registrars.

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.

Notably, the Complainant contends that the disputed domain names are confusingly similar to its well-known trademark RANKINGCOACH, as they incorporate the mentioned trademark in its entirety together with the additional numbers one (“1”), two (“2”) or three (“3”) in addition to the generic Top-Level Domains (gTLD) “.xyz”, “.life”, “.store”, “.online”, “.top”, “.com” and “.dad”.

As regards the second element, the Complainant argues that the Respondents are not affiliated with the Complainant in any way and have not been authorized by the Complainant to use and register its RANKINGCOACH trademark or to seek registration of any domain name incorporating said marks. In fact, the Respondents' contact details consist of names and addresses of a most unlikely structure, and are obviously contrived.

Moreover, the disputed domain names <rankingcoach2.xyz>, <rankingcoach2.life>, <rankingcoach3.xyz> and <rankingcoach3.top> resolved to fraudulent login pages which reproduce the Complainant's official logo above the login form to which the visitors are required to input their usernames/phone numbers and passwords in order to log in to their account or to register the account by inserting their personal information, hence, it appears that the Respondents have registered the disputed domain names in order to lead Internet users to believe that there is a business link between the Complainant and the Respondents, and to free ride on the reputation of the Complainant and its well-known RANKINGCOACH trademarks.

The disputed domain names <rankingcoach1.xyz> and <rankingcoach1.online> resolve to error pages with a “404 Not Found” notification displayed, while the disputed domain names <rankingcoach1.life> and <rankingcoach1.store> resolve to inactive webpages. The Complainant argues that even such lack of use of some of the disputed domain names should not be observed as a legitimate use, since there is no reason for the Respondents to register the Complainant's well-known RANKINGCOACH trademarks within the disputed domain names in combination with numbers. Moreover, at some point some of the disputed domain names were used to resolve to PPC pages.

Finally, the Respondents have not been commonly known by the name “rankingCoach” nor by any variation matching the disputed domain names.

With respect to the third element, the Complainant contends that it is implausible that the Respondents were unaware of the Complainant and its products when they registered the disputed domain names, because the Complainant's trademarks are used globally, the Complainant's brand is present in 32 countries worldwide, with their application available in 14 languages, and the registration of the disputed domain names occurred more than 14 years after the registration of the Complainant's domain name <rankingcoach.com> which is the official website of the Complainant. In addition, some of the disputed domain names display the Complainant's official logo at the top of the webpage. Further, the Complainant submits that some of the disputed domain names were offered for sale on the day of their registration, which might suggest that they were registered primarily for the purpose of selling them to the Complainant (or its competitor).

B. Respondents

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

6. Discussion and Findings

6.1. Consolidation: Multiple Respondents

The second amended Complaint was filed in relation to nominally different domain name registrants. The Complainant alleges that the domain name registrants are the same entity or mere alter egos of each other, or under common control. The Complainant requests the consolidation of the Complaint against the multiple disputed domain name registrants pursuant to paragraph 10(e) of the Rules.

The disputed domain name registrants did not comment on the Complainant's request.

Paragraph 3(c) of the Rules states that a complaint may relate to more than one domain name, provided that the domain names are registered by the same domain name holder.

In addressing the Complainant's request, the Panel will consider whether (i) the disputed domain names or corresponding websites are subject to common control; and (ii) the consolidation would be fair and equitable to all Parties. See WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition (["WIPO Overview 3.0"](#)), section 4.11.2.

As regards common control, the Panel notes that: (i) the disputed domain names are similar in construction in that they all include the RANKINGCOACH trademark of the Complainant together with a number, namely "1", "2", or "3" respectively, (ii) the disputed domain names were registered on August 20, 2024, or March 28, 2025, (iii) all disputed domain names resolve to similar pages displaying error messages ("connection timed out/error 522" or "this site can't be reached") except for the disputed domain name <rankingcoach3.com> which resolves to a login page requiring a password, (iv) according to the Complaint, the registrants provided address and contact details for all disputed domain names which seemed to be fictitious, and (v) the DNS settings for all of the disputed domain names are the same.

As regards fairness and equity, the Panel sees no reason why consolidation of the disputes would be unfair or inequitable to any Party.

Accordingly, the Panel decides to consolidate the disputes regarding the nominally different disputed domain name registrants (referred to below as "the Respondent") in a single proceeding.

6.2. Substantive issues

Although properly notified, no response has been received from the Respondent in this case. Accordingly, the Panel considers it can proceed to determine the Complaint based on the statements and documents submitted by the Complainant as per paragraph 15(a) of the Rules. The applicable standard of proof in UDRP cases is the "balance of probabilities" or "preponderance of the evidence", and the Panel can draw

certain inferences in light of the particular facts and circumstances of the case. [WIPO Overview 3.0](#), section 4.2.

To succeed, the Complainant must demonstrate that all of the elements listed in paragraph 4(a) of the Policy have been satisfied: (i) the disputed domain names are 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 the disputed domain names, and (iii) the disputed domain names have been registered and are 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 3.0](#), section 1.7.

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

The Panel finds the mark is recognizable within the disputed domain names. Accordingly, the disputed domain names are 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, "1", "2" or "3" respectively) 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 names and the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.8.

The Panel agrees that the TLD ".xyz", ".life", ".store", ".online", ".top", ".com" and ".dad" is disregarded in the confusing similarity test, as it does not form part of the comparison as it is a standard registration requirement for technical reasons. [WIPO Overview 3.0](#), section 1.11.1.

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.

There is no evidence that the Respondent is using the disputed domain names in connection with a bona fide offering of goods or services, nor does the Respondent appear to engage in any legitimate noncommercial or fair use of the disputed domain names within the meaning of paragraphs 4(c)(i) and (iii) of the Policy. Also, there is no evidence that the Respondent is commonly known by the disputed domain names within the meaning of paragraph 4(c)(ii) of the Policy.

Rather, according to the unrebutted evidence with the Complaint, the disputed domain names <rankingcoach2.xyz>, <rankingcoach2.life>, <rankingcoach3.top> and <rankingcoach3.xyz> and <rankingcoach3.com> resolved to websites featuring the Complainant's RANKINGCOACH trademark and requesting personal data as username and password to log in. Such use does not in the circumstances of this case give rise to any rights or legitimate interests on the Respondent's part.

Further, according to the unrebutted evidence submitted by the Complainant, the disputed domain names <rankingcoach3.com>, <rankingcoach3.dad>, <rankingcoach1.xyz>, <rankingcoach1.life>, <rankingcoach2.life> and <rankingcoach1.online> were used to host a parked page comprising PPC links, which presumably generate income for the Respondent. This use does not amount to a bona fide offering of goods or services, as such links compete with, or capitalize on, the Complainant's mark and mislead Internet users.

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.

Furthermore, the nature of the disputed domain names is inherently misleading, and cannot constitute a fair use as they effectively impersonate or suggest sponsorship or endorsement by the Complainant. See section 2.5.1 of the [WIPO Overview 3.0](#).

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.

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.

According to the unrebutted assertions of the Complainant, its RANKINGCOACH trademarks were widely used in commerce well before the registration of the disputed domain names, and are reputed. The disputed domain names are confusingly similar to the Complainant's trademarks and some of the disputed domain names resolved or still resolve to login pages displaying the Complainant's trademark and logo. Under these circumstances, it is most likely that the Respondent was aware of the Complainant's trademarks at the registration dates of the disputed domain names.

As regards the use of the disputed domain names, the Panel accepts the Complainant's evidence, which the Respondent has not disputed, that the Respondent used the disputed domain names <rankingcoach2.xyz>, <rankingcoach2.life>, <rankingcoach3.top>, <rankingcoach3.xyz> and <rankingcoach3.com> to resolve to websites featuring the Complainant's RANKINGCOACH trademark and requesting personal data as username and password to log in. Such use is likely to mislead Internet users looking for the Complainant's products or services. Accordingly, the Panel finds that, by using the disputed domain names, the Respondent has intentionally attempted to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant's trademark as to the source, sponsorship, affiliation, or endorsement of her website or of a product or service on her website (paragraph 4(b)(iv) of the Policy).

As regards the disputed domain names <rankingcoach3.com>, <rankingcoach3.dad>, <rankingcoach1.xyz>, <rankingcoach1.life>, <rankingcoach2.life> and <rankingcoach1.online>, they were used at the date of the Complaint or before the Complaint to direct to a website displaying PPC advertisements. Given the

confusing similarity between the Complainant's trademark and the mentioned disputed domain names, Internet users would likely be confused into believing that the Complainant is affiliated with the websites to which the disputed domain names resolve. Presumably the Respondent intends to benefit from the confusion created: it is likely that the Respondent earns income when Internet users click on the links in search of RANKINGCOACH services.

With respect to the disputed domain name <rankingcoach1.store> which was never active, and the others are currently inactive, Panels have found that the non-use of a domain name would not prevent a finding of bad faith under the doctrine of passive holding. [WIPO Overview 3.0](#), section 3.3. Having reviewed the available record, the Panel notes the reputation of the Complainant's trademark, and the composition of the disputed domain names, and finds that in the circumstances of this case the 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 <rankingcoach1.life>, <rankingcoach1.online>, <rankingcoach1.store>, <rankingcoach1.xyz>, <rankingcoach2.life>, <rankingcoach2.xyz>, <rankingcoach3.com>, <rankingcoach3.dad>, <rankingcoach3.top> and <rankingcoach3.xyz> be transferred to the Complainant.

/Mihaela Maravela/

Mihaela Maravela

Sole Panelist

Date: June 16, 2025