

## **ADMINISTRATIVE PANEL DECISION**

Hong Kong Sun Rise Trading Limited v. Iier Lei  
Case No. D2025-3344

### **1. The Parties**

The Complainant is Hong Kong Sun Rise Trading Limited, Hong Kong, China, represented by Abion AB, Sweden.

The Respondent is Iier Lei, United States of America ("United States").

### **2. The Domain Name and Registrar**

The disputed domain name <greenworksdeals.com> is registered with West263 International Limited (the "Registrar").

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on August 20, 2025. On August 20, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On August 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 (Registration Private) and contact information in the Complaint. The Center sent an email communication to the Complainant on August 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 the same day.

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 August 22, 2025. In accordance with the Rules, paragraph 5, the due date for Response was September 11, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on September 17, 2025.

The Center appointed Fabrizio Bedarida as the sole panelist in this matter on September 19, 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**

The Complainant is a corporation headquartered in Hong Kong, China. The Complainant specializes in the wholesale distribution of industrial machinery and equipment.

The Complainant has provided full listings of trademarks that correspond to and/or include GREENWORKS, registered in jurisdictions around the world.

The Complainant is, inter alia, the owner of:

European Union Trademark Registration number 018325110 for the GREENWORKS (device) trademark, registered on May 13, 2021;

European Union Trademark Registration number 018325105 for the GREENWORKS (device) trademark, registered on May 13, 2021; and

United States Trademark Registration number 6996861 for the GREENWORKS (word) trademark, registered on March 7, 2023.

The Complainant has also submitted a list of over two hundred domain names containing the GREENWORKS trademark, including <greenworkstools.com> (registered on May 19, 2009).

The disputed domain name was registered on August 14, 2025. It is currently inactive. Based on the evidence submitted by the Complainant, the disputed domain name previously resolved to a website displaying the GREENWORKS trademark and images of the Complainant's products, which were offered for sale at significantly discounted prices.

#### **5. Parties' Contentions**

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 that the addition of the term "deals" in the disputed domain name is not sufficient to prevent the finding of confusing similarity with the Complainant's trademark; that the Respondent's use of the disputed domain name for a website displaying the Complainant's GREENWORKS trademark, in an apparent attempt to impersonate the Complainant or to suggest an affiliation with the Complainant, does not give rise to rights or legitimate interests; and that bad faith registration and use should be found, as the Respondent registered the disputed domain name and used the Complainant's GREENWORKS trademark on the corresponding website while being aware of the Complainant's trademark rights, with the intent to take advantage of and capitalize on the Complainant's well-known trademark.

Furthermore, the Complainant points out that the disputed domain name resolved to a website that copied the Complainant's official website, using copyrights protected photographs and trademarks. The disputed domain name thus appears to have been used for the sale of GREENWORKS-branded products at highly discounted prices, thereby creating confusion among consumers.

The Complainant, citing *E. Remy Martin & C° v. Lei Lier*, WIPO Case No. [D2023-1490](#) and *Chateau Lafite Rothschild v. Lei Lier, Price TTTp*, WIPO Case No. [D2023-4213](#), asserts that the Respondent has displayed a pattern of cybersquatting conduct, and that this is further evidence of bad faith.

## **B. Respondent**

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

## **6. Discussion and Findings**

In order for the Complainant to obtain a transfer of the disputed domain name, paragraph 4(a) of the Policy requires that the Complainant must demonstrate to the Panel that:

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

### **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 Panel finds the GREENWORKS mark is incorporated entirely and recognizable 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 term here, "deals", 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.

The Panel notes that the composition of the disputed domain name, which incorporates the Complainant's trademark together with the term "deals" (for a website allegedly offering the Complainant's goods at discounted prices) affirms the Respondent's intention of taking unfair advantage of the likelihood of confusion between the disputed domain name and the Complainant as to the origin or affiliation of the website at the dispute domain name, and as such, the disputed domain name cannot qualify as fair use.

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.

In the present case, the Panel notes that, as discussed below, it is highly likely that the Respondent was aware of the Complainant's trademark registrations and rights to the GREENWORKS trademark when it registered the disputed domain name.

The disputed domain name contains in its entirety, without any relationship, authorization or approval by the Complainant, the Complainant's registered GREENWORKS trademark combined with the term "deals".

Owing to the substantial presence established worldwide and on the Internet by the Complainant, it is unlikely that the Respondent was not aware of the existence of the Complainant, or of the Complainant's trademark and domain name, when registering the disputed domain name.

In fact, the Complainant's GREENWORKS trademark as well as the domain names comprising "greenworks" were registered several years before the Respondent registered the disputed domain name.

Noting also the composition of the disputed domain name, which incorporates the Complainant's trademark along with the additional term "deals", combined with the fact that the Respondent's website displays the GREENWORKS trademark, as well as purportedly sells the Complainant's products, it is more likely than not that the Respondent, when registering the disputed domain name, had knowledge of the Complainant's prior rights to the GREENWORKS trademark. The Panel is therefore satisfied that the Respondent has registered the disputed domain name in bad faith.

Further, by using the disputed domain name, the Panel notes that 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. Such use constitutes bad faith pursuant to paragraph 4(b)(iv) of the Policy.

In addition, it appears that the Respondent has been involved in at least two previous UDRP proceedings, in which the Respondent was found to have registered and used, in bad faith, domain names corresponding to well-known trademarks owned by third parties.

Finally, the bad faith registration and use of the disputed domain name are further supported by the fact that the Respondent has not denied the assertions of bad faith made by the Complainant in these proceedings.

Having reviewed the record, the Panel finds that the Respondent's registration and use of the disputed domain name constitute bad faith under 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 <greenworksdeals.com> be transferred to the Complainant.

*/Fabrizio Bedarida/*

**Fabrizio Bedarida**

Sole Panelist

Date: October 1, 2025