

## **ADMINISTRATIVE PANEL DECISION**

Hong Kong Sun Rise Trading Limited v. dfg sd  
Case No. D2025-3348

### **1. The Parties**

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

The Respondent is dfg sd, United States of America ("United States").

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

The disputed domain name <supergreenworkstools.shop> is registered with Spaceship, Inc. (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 (Redacted for privacy, Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on August 21, 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 August 22, 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 August 25, 2025. In accordance with the Rules, paragraph 5, the due date for Response was September 14, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on September 17, 2025.

The Center appointed Oleksiy Stolyarenko as the sole panelist in this matter on September 23, 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 Hong Kong Sun Rise Trading Limited, a corporation headquartered in Hong Kong, China, specializing in the wholesale distribution of industrial machinery and gardening equipment. The Complainant has operated in this field for many years and is a duly incorporated entity under the laws of Hong Kong, China.

The Complainant has rights over the GREENWORKS mark, registered in numerous jurisdictions worldwide, including the following:

- United States Registration No. 6890998 for GREEN WORKS stylized word mark registered on November 1, 2022 for goods in Classes 9 and 11;
- United States Registration No. 6890996 for GREENWORKS registered on November 1, 2022 for goods in Classes 9 and 11.

The vast majority of the Complainant's trademarks for GREENWORKS predate the registration of the disputed domain name. The GREENWORKS mark is used in connection with industrial machinery and gardening equipment and related goods and services. The Complainant has intensively used these trademarks since their registration.

In addition, the Complainant is the owner of numerous domain name registrations throughout the world containing the GREENWORKS mark, distributed among generic Top-Level Domains ("gTLDs") and country code Top-Level Domains ("ccTLDs"), including the domain name <greenworkstools.com>, which is used to resolve to its official website. The Complainant has operated its official website at "www.greenworkstools.com" since 2009 and maintains a strong online presence through this and social media platforms.

The disputed domain name <supergreenworkstools.shop> was registered on June 26, 2025. According to the Complainant, the Respondent is using the disputed domain name for a website that copies the Complainant's main corporate website, including copyright-protected images and logotypes, and purports to offer identical products under the GREENWORKS brand.

According to the Registrar's information, the Respondent is identified as "dfg sd," with an address in the United States.

#### **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.

The Complainant contends that it has established rights in the GREENWORKS trademark by virtue of longstanding use and registration in numerous jurisdictions worldwide. The trademark GREENWORKS is distinctive and well known in connection with the Complainant's business of industrial machinery and gardening equipment. The Complainant has made substantial investments to develop and protect the GREENWORKS brand globally and has operated its official website at "www.greenworkstools.com" since 2009, maintaining a strong online presence and reputation in the field.

The disputed domain name consists of the Complainant's GREENWORKS trademark in its entirety, together with the additional terms "super" and "tools." According to the Complainant, these additions do not avoid confusion; instead, they reinforce the association with the Complainant's products and brand. The Complainant asserts that Internet users will wrongly assume a connection with or endorsement by the Complainant.

The Respondent has no rights or legitimate interests in the disputed domain name and registered many years after the Complainant's trademarks were registered and widely used. The Complainant has not authorized the Respondent to use the GREENWORKS mark. The Respondent is not commonly known by the disputed domain name, and there is no evidence that the disputed domain name is used in connection with a bona fide offering of goods or services.

The Respondent was fully aware of the Complainant's reputation and trademark rights in the GREENWORKS mark when the Respondent registered the disputed domain name because the disputed domain name has been used for a website that copies the Complainant's official website, including copyright-protected images and logotypes, and purports to offer products identical to those of the Complainant. The Complainant contends that such use demonstrates an intent to capitalize on the Complainant's goodwill and amounts to registration and use in bad faith.

Accordingly, the Complainant seeks a decision that the disputed domain name be transferred to the Complainant.

## **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 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.

The domain name combines the GREENWORKS mark with the additional terms "super" and "tools," as well as the gTLD ".shop."

The GREENWORKS mark remains clearly recognizable within the disputed domain name. The terms "super" and "tools" are descriptive and dictionary words that describe the type and quality of products for which the Complainant's mark is used. The inclusion of these terms does not prevent a finding of confusing similarity. Domain names that consist of a trademark together with additional terms are considered by panels to be confusingly similar to the relevant mark for purposes of the first element. See [WIPO Overview 3.0](#), section 1.8.

The gTLD ".shop" is viewed as a standard registration requirement and as such is disregarded under the first element confusing similarity test. [WIPO Overview 3.0](#), section 1.11.1. Therefore, the Panel disregards the gTLD for the purposes of this comparison.

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.

According to the Complainant, the Respondent is not authorized or licensed to use the GREENWORKS trademark in the disputed domain name.

Moreover, given that the disputed domain name incorporates the Complainant’s trademark in its entirety, together with descriptive terms directly related to the Complainant’s field of business, the Panel struggles to conceive any legitimate interests of the Respondent in the disputed domain name.

The Complainant has provided evidence confirming that the website at the disputed domain name is a copycat version of the Complainant’s official website, using copyright-protected images and logotypes, and purporting to offer identical products under the GREENWORKS brand. The Complainant further alleges that no genuine products are sold and that the website is being used as a platform for scams.

Under such circumstances, any use of the disputed domain name by the Respondent only increases the possibility of Internet users falsely attributing the disputed domain name to the activities of the Complainant, also noting the composition of the disputed domain name may mislead Internet users into believing that the disputed domain name is connected to the Complainant.

The Respondent did not submit a Response or attempt to demonstrate any rights or legitimate interests in the disputed domain name, and the Panel draws adverse inferences from this failure, where appropriate, in accordance with the Rules, paragraph 14(b).

Taking into account the reputation and long period of use of the Complainant’s GREENWORKS trademark in the Complainant’s corresponding domain name and website, and in the absence of evidence to the contrary, the Panel finds that the Respondent is not involved in a bona fide offering of goods or services (under paragraph 4(c)(i) of the Policy) and the Respondent’s activities do not fall under a legitimate noncommercial or fair use (under paragraph 4(c)(iii) of the Policy).

The Panel did not find any evidence that the Respondent is commonly known by the disputed domain name and concludes that the Respondent is not commonly known by the disputed domain name under paragraph 4(c)(ii) of the Policy.

Panels have held that the use of a domain name for illegitimate activity, in this case, impersonation/passing off or other types of fraud 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 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 the Respondent has registered and used the disputed domain name in bad faith within the meaning of paragraph 4(b)(iv) of the Policy. The record demonstrates that the Respondent registered the disputed domain name long after the Complainant had established rights in the GREENWORKS trademark, which is known in the field of industrial machinery and gardening equipment.

The Panel observes that the disputed domain name wholly incorporates the Complainant's trademark, together with descriptive terms directly related to the Complainant's business ("super" and "tools") and resolves to a website that copies the Complainant's official website, including copyright-protected images and logotypes. The website purports to offer identical products under the GREENWORKS brand.

The Panel finds that the Respondent's conduct falls squarely within the circumstances described in paragraph 4(b)(iv) of the Policy, namely, 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 mark as to the source, sponsorship, affiliation, or endorsement of the website and the products offered thereon.

Panels have also held that the use of a domain name for illegitimate activity, in this case, impersonation/passing off or other types of fraud, 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 <supergreenworkstools.shop> be transferred to the Complainant.

*/Oleksiy Stolyarenko/*

**Oleksiy Stolyarenko**

Sole Panelist

Date: October 8, 2025