

## **ADMINISTRATIVE PANEL DECISION**

Reckitt & Colman (Overseas) Health Limited v. ntege johnpaul, reckittuganda  
Case No. D2025-3354

### **1. The Parties**

Complainant is Reckitt & Colman (Overseas) Health Limited, United Kingdom, represented by Studio Barbero S.p.A., Italy.

Respondent is ntege johnpaul, reckittuganda, Uganda.

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

The disputed domain name <reckittafrica.com> (the “Domain Name”) is registered with NameCheap, 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 Domain Name. On August 21, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the Domain Name which differed from the named Respondent (Redacted for Privacy Registrant, Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to Complainant on August 26, 2025, providing the registrant and contact information disclosed by the Registrar, and inviting Complainant to submit an amendment to the Complaint. Complainant filed an amendment to the Complaint on August 28, 2025.

The Center verified that the Complaint together with the amendment to the 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 Respondent of the Complaint, and the proceedings commenced on August 29, 2025. In accordance with the Rules, paragraph 5, the due date for Response was September 18, 2025. Respondent did not submit any response. Accordingly, the Center notified Respondent’s default on September 22, 2025.

The Center appointed Dinant T. L. Oosterbaan as the sole panelist in this matter on September 25, 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 the information provided on record, Complainant has a long history starting in 1819. In March 2021, Complainant rebranded as Reckitt. Complainant manufactures and markets health, personal care and household products, including over-the-counter pharmaceuticals. Complainant has around 37,900 employees and operations in more than 60 countries.

Complainant owns multiple trademarks for RECKITT, including International Trademark Registration for RECKITT, with registration number 1621375, date of registration March 24, 2021, and Uganda Trademark Registration for RECKITT, with registration number 71092, date of registration April 16, 2021.

In addition, Complainant operates multiple websites incorporating the RECKITT mark in numerous generic Top-Level Domains (“gTLDs”) and country code Top-Level Domains (“ccTLDs”), including its primary corporate website under the domain name <reckitt.com>, registered in the name of Complainant’s affiliated company Reckitt Benckiser SARL.

The Domain Name was registered on June 24, 2025.

The trademark registrations of Complainant were issued prior to the registration of the Domain Name.

The Domain Name has been redirected to Complainant’s primary corporate website under the domain name <reckitt.com>. In addition, the Domain Name has active Mail eXchange (“MX”) records in its Domain Name System (“DNS”) configuration.

#### **5. Parties’ Contentions**

##### **A. Complainant**

Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the Domain Name.

Notably, Complainant contends that the Domain Name is confusingly to the registered trademark RECKITT in which Complainant has rights. The Domain Name entirely reproduces the trademark RECKITT, with the mere addition of the geographical term “africa”, which is not a distinguishing feature. Complainant argues that the addition of the term “africa” to the trademark RECKITT is indeed apt to increase the likelihood of confusion since Internet users might believe that the Domain Name is owned and used by Complainant to promote its business and products in Africa.

Complainant contends that Respondent does not have any rights or legitimate interests in the Domain Name. Complainant submits that Respondent is not an employee of Complainant and has not been authorized to register the Domain Name, incorporating the trademark RECKITT, and to redirect it to Complainant’s official website. Respondent is also not commonly known by a name corresponding to the Domain Name as an individual, business, or other organization. Furthermore, Respondent has not provided Complainant with any evidence of use of, or demonstrable preparations to use, the Domain Name in connection with a bona fide offering of goods or services before or after any notice of the dispute herein.

The Domain Name has been redirected since registration to Complainant’s official website “www.reckitt.com”. Therefore, Respondent clearly intended to generate the impression that the Domain

Name was under the control of Complainant or one of its affiliated companies. Such use can be considered neither as a bona fide offering of goods or services nor as a legitimate noncommercial or fair use of the Domain Name.

Furthermore, the Domain Name has MX records active, which is a further cause of concern for Complainant, as recipients of emails sent from email addresses based on the Domain Name are likely to believe that they originate from Complainant.

According to Complainant, the Domain Name was registered and is being used in bad faith. In light of the prior registration and use of Complainant's trademark RECKITT worldwide, including on the Internet, Complainant submits that it is inconceivable that Respondent was unaware of the existence of Complainant's trademarks at the time of registration of the Domain Name. Moreover, since the Domain Name incorporates the trademark RECKITT in its entirety with the mere addition of the term "africa", Respondent clearly registered the Domain Name with the intention to target Complainant and its trademarks, inducing users to believe that the Domain Name is owned and operated by Complainant or one of its affiliated companies. Furthermore, Respondent's actual knowledge of Complainant and its trademark is clearly demonstrated by the fact that Respondent has redirected the Domain Name to Complainant's official website "www.reckitt.com". It is thus apparent that Respondent was familiar with Complainant and its trademarks and registered the Domain Name for impersonation purposes.

Complainant asserts that the redirection of the Domain Name to Complainant's official website is clearly aimed at inducing users to believe that the Domain Name is operated by Complainant or one of its affiliates. Such conduct clearly demonstrates that the sole purpose of Respondent has always been to take advantage of Complainant's reputation and of the well-known character of Complainant's trademarks by causing an erroneous association with Complainant, its activities and products. Moreover, considering that MX records have been set up in the DNS configuration of the Domain Name, it is likely that the Domain Name may be used for the receipt as well as for the sending of email communications from "@reckittafrica.com" addresses, which may mislead recipients into believing that the messages are sent by Complainant or one of its affiliated entities.

## **B. Respondent**

Respondent did not reply to the Complainant's contentions.

## **6. Discussion and Findings**

Paragraph 15(a) of the Rules instructs the Panel to "decide a complaint on the basis of the statements and documents submitted and in accordance with the Policy, these Rules and any rules and principles of law that it deems applicable".

Paragraph 4(a) of the Policy requires that a complainant proves each of the following three elements to obtain an order that the disputed domain name should be transferred or cancelled:

- (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.

The Panel will proceed to analyze whether the three elements of paragraph 4(a) of the Policy are satisfied in this proceeding.

## **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 Complainant's trademark and the Domain Name. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 1.7.

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 RECKITT mark is reproduced within the Domain Name. Accordingly, the Domain Name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

The Panel finds that the addition of the geographic term "africa" in the Domain Name does not prevent a finding of confusing similarity between the Domain Name and the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.8.

The gTLD ".com" is disregarded under the first element confusing similarity test. [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.

Having reviewed the available record, the Panel finds Complainant has established a prima facie case that Respondent lacks rights or legitimate interests in the disputed domain name. Respondent has not rebutted Complainant's prima facie showing and has not come forward with any relevant evidence demonstrating rights or legitimate interests in the Domain Name such as those enumerated in the Policy or otherwise.

Complainant has stated it has not authorized or otherwise permitted Respondent to make any use of its RECKITT trademark or to use its mark in association with the registration of the Domain Name. Based on the undisputed submission and evidence provided by Complainant, the Domain Name redirects to the official website of Complainant. Respondent is also not commonly known by the Domain Name nor has it acquired any trademark or service mark rights compromised by the RECKITT expression. Moreover, the construction of the Domain Name is inherently misleading and carries a risk of implied affiliation given the addition of the geographic term "africa" to the RECKITT trademark, which may mislead Internet users into believing that the Domain Name is owned by Complainant or its related entity, contrary to the fact. Respondent is not making a legitimate noncommercial or fair use of the Domain Name, without intent for commercial gain to misleadingly divert Internet users or to tarnish the trademark of Complainant. The Panel does not consider the use of the Domain Name for redirecting to Complainant's website a bona fide offering of goods or services, nor a legitimate noncommercial or fair use of the Domain Name. No Response to the Complaint was filed and Respondent has not rebutted Complainant's prima facie case.

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

### **C. Registered and Used in Bad Faith**

The Panel finds that the Domain Name has been registered and is being used in bad faith.

The trademarks of Complainant have been existing for some time and are well known. The Panel notes that Complainant's registration of its trademarks predate the registration date of the Domain Name. Respondent knew or should have known that the Domain Name had included the entirety of Complainant's RECKITT trademark especially as the addition of the geographic term "africa" and the redirection of the Domain Name to the official website of Complainant, which indicates that when registering the Domain Name, Respondent was familiar with Complainant and its trademarks.

The Panel notes that Respondent's use of the Domain Name which redirects to Complainant's official website indicates that Respondent possibly registered the Domain Name with the intention to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the trademarks of Complainant as to the source, sponsorship, affiliation, or endorsement of its website or location or of a service on its website or location, which constitutes registration and use in bad faith in a similar manner to that provided under paragraph 4(b)(iv) of the Policy.

The Panel finally notes the following: Complainant has alleged that Respondent has configured MX records for the Domain Name, suggesting an intention to use the Domain Name for illegal purposes. While the record in this case contains no evidence of illegal behavior, the configuration of MX records presents the potential for an email phishing scheme impersonating Complainant. The use of a domain name that is confusingly similar to a trademark in email communications that do not originate from the trademark owner presents a risk to the reputation of a trademark and its owner. Respondent has not rebutted Complainant's contentions, which is noteworthy given the configuration of MX records for the Domain Name and redirection of the Domain Name to Complainant's official website, suggests the possibility of Respondent's intention to use the Domain Names for illegal purposes.

The Panel finds that 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 Domain Name, <reckittafrica.com>, be transferred to Complainant.

*/Dinant T. L. Oosterbaan/*

**Dinant T. L. Oosterbaan**

Sole Panelist

Date: October 2, 2025