

ADMINISTRATIVE PANEL DECISION

Buyers Products Company v. Vladimir Veselovskiy
Case No. D2025-4111

1. The Parties

The Complainant is Buyers Products Company, United States of America (“United States”), represented by Emerson Thomson Bennett, LLC, United States.

The Respondent is Vladimir Veselovskiy, Ukraine.

2. The Domain Name and Registrar

The disputed domain name <thesaltdogg.com> is registered with NameCheap, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on October 8, 2025. On October 9, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On October 9, 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 (Unknown Registrant via NAMECHEAP INC.) and contact information in the Complaint. The Center sent an email communication to the Complainant on October 16, 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 October 20, 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 October 29, 2025. In accordance with the Rules, paragraph 5, the due date for Response was November 18, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on November 19, 2025.

The Center appointed Andrew F. Christie as the sole panelist in this matter on November 27, 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. Further Procedural Considerations

Under paragraph 10 of the Rules, the Panel is required to ensure that the Parties are treated with equality and that each Party is given a fair opportunity to present its case, and also that the administrative proceeding takes place with due expedition.

Since the Respondent's mailing address is stated to be in Ukraine, which is subject to an international conflict at the date of this Decision that may impact case notification, it is appropriate for the Panel to consider, in accordance with its discretion under paragraph 10 of the Rules, whether the proceeding should continue.

There is no evidence that Complaint together with the amended to the Complaint was not delivered to the Respondent's email address, as provided by the Registrar. It is moreover noted that, for reasons which are set out later in this Decision, the Panel has no serious doubt (albeit in the absence of any Response) that the Respondent registered and has used the disputed domain name in bad faith, with the intention of unfairly targeting the Complainant's goodwill in its trademark.

The Panel concludes that the Parties have been given a fair opportunity to present their case, and so that the administrative proceeding takes place with due expedition the Panel will proceed to a Decision accordingly.

5. Factual Background

The Complainant is a corporation based in Ohio, United States. It is the owner of United States trademark registration No. 4425749 for the word trademark SALTDogg, registered October 29, 2013, for "Mechanical spreaders", with a first use in commerce date of June 1, 2004.

The disputed domain name was registered on April 30, 2024. The Complainant provided a screenshot, dated October 3, 2025, showing that the disputed domain name resolved to a website with a heading containing the text "SaltDogg" and a cartoon image of the head of a dog. The website stated, "We're Salt Dogg, a Modern Spreader Manufacturer" and purporting to offer various products, including "Salt Dogg Spreader Parts", "Salt Dogg Spreader Control Box", and "Salt Dogg Salt Spreader". The website also contains what appear to be link buttons, labelled "Learn more", "Check Price", "Contact us now", and "Reach out now".

As at the date of this decision, the disputed domain name does not resolve to an active location.

6. 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 the disputed domain name is identical to a trademark in which it has rights on the following grounds. The disputed domain name is identical to the Complainant's word trademark SALT DOGG with the word "the" added at the beginning.

The Complainant contends that the Respondent has no rights or legitimate interests in the disputed domain name on the following grounds, among others. The Complainant has used the distinctive SALTDogg trademark to sell mechanical spreaders at least as early as June 1, 2004. The active registration for the SALTDogg trademark was issued to the Complainant on October 29, 2013. The disputed domain name was registered April 30, 2024, which is after both the Complainant's first use date and registration date of the SALTDogg trademark. The Respondent is not an authorized seller of the Complainant's goods. However, the Respondent purports to be selling the Complainant's goods. Upon information and belief, the "Check Price," "Learn More," and "Reach Out Now" buttons once contained links to products for which the Respondent received affiliate credit. Currently, the links are broken. The Complainant's customers may incorrectly believe items to be out of stock or no longer for sale if they are directed to the Respondent's website. The Respondent is also not using the disputed domain name in legitimate noncommercial fair use. The "Contact info" button at the bottom of the Respondent's page lists the Complainant's information.

The Complainant contends that the Respondent has registered and is using the disputed domain name in bad faith on the following grounds, among others. The disputed domain name was acquired after the Complainant's trademark rights accrued. The Respondent purchased the disputed domain name to profit off the Complainant's trademark rights and goodwill, to block the Complainant from owning the disputed domain name, and to disrupt the Complainant's business. The Respondent's website lists the Complainant's contact information, even though the Respondent is outside the United States. The disputed domain name was registered to disrupt the Complainant's business. The Complainant has no option, other than this Amended Complaint, to ensure that the Respondent is not using the disputed domain name for phishing attacks, misdirection of consumers, theft of affiliate funds, or any other fraudulent purpose.

B. Respondent

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

7. 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. It is the owner of a trademark registration for the word trademark SALT DOGG.

Once the generic Top-Level Domain ("gTLD") ".com" is ignored (which is appropriate in this case), the disputed domain name consists of the Complainant's word trademark preceded by the word "the". The Complainant's trademark is recognizable within the disputed domain name, and that the addition of the prefix does not prevent a finding of confusing similarity between the disputed domain name and the trademark for the purposes of the Policy. Accordingly, the disputed domain name is confusingly similar to the Complainant's trademark for the purposes of the Policy.

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.

The Respondent is not a licensee of the Complainant, is not otherwise affiliated with the Complainant, and has not been authorized by the Complainant to use its SALT DOGG trademark. The Respondent has not provided any evidence that it has been commonly known by, or has made a bona fide use of, the disputed domain name, or that it has, for any other reason, rights or legitimate interests in the disputed domain name. The composition of the disputed domain name carries a risk of implied affiliation with the Complainant. The evidence establishes that the Respondent has used the disputed domain name to direct to a website which purports to offer various products described using the Complainant’s trademark. Such use of the disputed domain name is not a bona fide offering of goods or services and is not a legitimate noncommercial or fair use. Accordingly, such use does not confer on the Respondent rights or legitimate interests in the disputed domain name.

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 finds the second element of the Policy has been established.

C. Registered and Used in Bad Faith

In the present case, the Panel notes that: (i) the Respondent registered the disputed domain name two decades after the Complainant first used, and one decade after the Complainant first registered, its SALT DOGG trademark; (ii) the disputed domain name incorporates the Complainant’s trademark in its entirety, and merely precedes it with the word “the”; and (iii) the Respondent has used the disputed domain name to direct to a website which purportedly offers products described using the Complainant’s trademark. It is clear the Respondent registered the disputed domain name with knowledge of the Complainant’s trademark.

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. The evidence shows that the Respondent has used the disputed domain name in an intentional attempt to attract, for commercial gain, Internet users to a website by creating a likelihood of confusion with the Complainant’s trademark. Having reviewed the record, the Panel finds that 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.

8. 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 <thesaltdogg.com> be transferred to the Complainant.

/Andrew F. Christie/

Andrew F. Christie

Sole Panelist

Date: December 11, 2025